

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

<b>IN RE:</b>  <b>3443 ZEN GARDEN, L.P.</b>  <b>DEBTOR.</b>	§ § § § §	<b>CASE NO. 1:20-10410-HCM</b>  <b>Chapter 11</b>
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**SUMMARY FOR SECOND AND FINAL APPLICATION OF WICK PHILLIPS  
GOULD & MARTIN, LLP, COUNSEL TO TRUSTEE, FOR ALLOWANCE OF  
COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF  
EXPENSES INCURRED FROM APRIL 22, 2020 THROUGH FEBRUARY 2, 2021**

**This application requests relief that may be adverse to your  
interests.**

**If no timely response is filed within 21 days from the date of  
service, the relief requested herein may be granted without a  
hearing being held.**

**A timely filed response is necessary for a hearing to be held.**

The firm of Wick Phillips Gould & Martin, LLC (“**Wick Phillips**” or “**Applicant**”), counsel to Gregory S. Milligan, Chapter 11 Trustee (the “**Trustee**”) of the bankruptcy estate (the “**Estate**”) of 3443 Zen Garden, L.P. (the “**Debtor**”) in the above-captioned chapter 11 case, submits this Summary for its Second and Final Application for Allowance of Compensation for Services Rendered and Reimbursement for Expenses Incurred (the “**Application**”) from April 22, 2020 through February 2, 2021 (the “**Application Period**”). The following is a summary of the information detailed in the Application.

- I. Client.** The Trustee.
- II. Requesting Applicant/Firm.** Wick Phillips.
- III. Total Amount of Fees Requested to be Paid and/or Approved:**
  - a. Total Hours Worked: 1935.4
  - b. Fees Billed: \$917,543.50
  - c. Expenses Incurred: \$15,983.75
  - d. Total Fees and Expenses: \$933,527.25
  - e. Amount Previously Paid under prior orders: \$830,877.51
  - f. Amount Remaining to be Paid under this Application: \$102,649.74
  - g. Time period covered: April 22, 2020 through February 2, 2021

#### IV. BREAK OUT CURRENT APPLICATION

A. Fees for the period of April 22, 2020 through February 2, 2021:

Timekeeper	Title	Year Admitted	Billing Rate (2020)	Hours (2020)	Billing Rate (2021)	Hours (2021)	Value
Rudd, Jason M.	Partner	2000	\$ 560.00	369.1	\$615.00	133.10	\$431,744.50
Nelson, Nick B.	Partner	2010	\$ 495.00	102.8	\$515.00	11.40	\$83,586.00
Bailey, Michael W.	Partner	2008	\$ 545.00	19.4	\$575.00	0.50	\$10,588.00
Dalton, Jeff M.	Partner	1999	\$ 515.00	21.3		0.00	\$13,596.00
Keeble, Charles C.	Partner	1986	\$ 560.00	18.1		0.00	\$10,136.00
Zucker, Matthew I.	Partner	2007	\$ 515.00	0.2		0.00	\$103.00
Cannon, Patrick C.	Of Counsel	2002	\$ 425.00	3.9		0.00	\$1,657.50
Lawrence, Scott D.	Associate	2013	\$ 420.00	423.0	\$450.00	98.20	\$321,894.00
Heringer, Daniella G.	Associate	2019	\$ 335.00	59.4		0.00	\$19,564.00
Drawhorn, Lauren K.	Associate	2010	\$ 475.00	8.6		0.00	\$4,085.00
Goins, Ryan A.	Associate	2009	\$ 475.00	3.0		0.00	\$2,280.00
Ramirez, Brenda	Legal Assistant	N/A	\$ 165.00	53.4	\$175.00	17.60	\$18,309.50
<b>Total:</b>							<b>\$917,543.50</b>

B. Blended Hourly Rate: \$917,543.50 / 1935.4 hours = \$474.08

C. Minimum Fee Increments: Wick Phillips bills time in tenths of hours.

D. Expenses: Wick Phillips is requesting expenses incurred in the amount of \$15,983.75, Wick Phillips charges actual cost (no premium) for services provided by third parties.

Expenses	Amount
Copies	\$ 6,474.25
Exhibit Binders	\$ 2,041.29
Delivery Services	\$ 506.74
Online Research	\$ 424.58
Postage	\$ 1,617.99
Travel & Related Expenses	\$ 283.93
Court Reporting - Auction	\$ 870.55
Transcript	\$ 501.40
Process Serving	\$ 199.50
Discovery Hosting	\$ 3,063.52
Total	\$ 15,983.75

V. **Prior Applications.** Under this Court's *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* (ECF No. 135, the "**Fee Procedures Order**"), the Trustee has paid Wick Phillips a total of \$732,491.31. Wick Phillips

filed its *First Interim Application for Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred from April 22, 2020 through September 30, 2020* (ECF No. 304, the “**First Interim Application**”) on November 10, 2020. The Court granted the First Interim Application by Order dated December 7, 2020 (ECF No. 332, the “**First Interim Order**”). The Trustee subsequently paid Wick Phillips \$98,386.20 as authorized under the First Interim Order. Thus, the Trustee has previously paid Wick Phillips a total of \$830,877.51 for reasonable and necessary fees and expenses incurred during the Case.

**VI. Other Co-equal or Administrative Claimants in this Case:** N/A. Allowance of Wick Phillips’ Final Application will not result in the Estate not being able to pay all co-equal or superior administrative claims in this case.

**VII. Result Obtained.** As detailed in the application, Wick Phillips has advised the Trustee regarding the Trustee’s successful confirmation of a plan of liquidation that provided a return in excess of 80% to general unsecured creditors in the Case. The case status and the results obtained are described in more detail in the Application. Throughout the application period, Wick Phillips represented the Trustee as lead bankruptcy counsel in negotiations with secured creditors and other interested parties. The Application describes the case status and the results obtained in more detail.

**VIII. Rates.** The rates sought herein are reasonable considering the complexity of the case and the professionals’ expertise. For example, Mr. Rudd represents numerous chapter 11 trustees as lead bankruptcy counsel. Mr. Rudd brings approximately 20 years’ experience representing clients in bankruptcy matters leading a team of professionals recognized locally and regionally as experienced and highly qualified. Moreover, Wick Phillips has spent time in this Case dealing with complex and novel issues, divergent creditor constituencies and at times faced time constraints.

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<b>IN RE:</b>	§	
	§	<b>CASE NO. 1:20-10410-HCM</b>
<b>3443 ZEN GARDEN, L.P.</b>	§	
	§	<b>Chapter 11</b>
<b>DEBTOR.</b>	§	

**SECOND AND FINAL APPLICATION OF WICK PHILLIPS GOULD & MARTIN,  
LLP, COUNSEL TO TRUSTEE, FOR ALLOWANCE OF COMPENSATION FOR  
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED  
FROM APRIL 22, 2020 THROUGH FEBRUARY 2, 2021**

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Wick Phillips Gould & Martin, LLP (“**Wick Phillips**” or “**Applicant**”), counsel to Gregory S. Milligan, Chapter 11 Trustee (the “**Trustee**”) of the bankruptcy estate (the “**Estate**”) of 3443 Zen Garden, L.P. (the “**Debtor**”) in the above-captioned chapter 11 case, submits its Second and Final Fee Application for Allowance of Compensation for Services Rendered and Reimbursement for Expenses Incurred from April 22, 2020 through February 2, 2021, (“**Application**”) pursuant to sections 327, 328(a), and 331 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), Rule 2016 of the Local Rules of the United States Bankruptcy Court for the Western District of Texas (the “**Bankruptcy Local Rules**”), and this Court’s *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* (ECF No. 135, the “**Fee Procedures Order**”) (i) for the allowance of compensation in the amount of \$917,543.50 for



professional services performed by Wick Phillips and expenses in the amount of \$15,983.75 for the period April 22, 2020 through February 2, 2021 (the “**Application Period**”), and (ii) authorize the Trustee to pay Wick Phillips \$102,649.74, which is the amount remaining due to Wick Phillips after accounting for disbursements under this Court’s prior orders.

This Court has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334. Venue for this proceeding is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409. The statutory predicates for the relief sought by this Application are sections 327, 328(a), 330(a), and 331 of the Bankruptcy Code.

In support of the Application, Wick Phillips would respectfully represent to the Court as follows:

## **I. BACKGROUND**

### **A. Bankruptcy Filing**

1. Certain petitioning creditors (the “**Petitioning Creditors**”) initiated the above-captioned bankruptcy case (the “**Case**”) by filing an involuntary chapter 11 petition on March 22, 2020 (the “**Petition Date**”).

2. This Court entered its *Consent Order for Entry of Relief* (ECF No. 11, the “**Relief Order**”) on April 8, 2020 (the “**Relief Order Entry Date**”).

3. On April 9, 2020, the Petitioning Creditors filed their *Expedited Motion for Order Requiring Appointment of a Chapter 11 Trustee*. See ECF No. 14. This Court entered its *Order Requiring Appointment of a Chapter 11 Trustee* on April 15, 2020. See ECF No. 27. The United States Trustee filed its *Application for Order Approving Appointment of the Trustee* and the Court granted it on April 22, 2020 (the “**Appointment Date**”), appointing the Trustee. See ECF Nos. 35 & 36.

4. The primary assets of the Estate were land, buildings, and other improvements located at 3443 Ed Bluestein Boulevard in Austin, Texas (collectively, the “**Property**”). *See* ECF No. 48 (the “**Schedules**”) at p. 8. The Trustee sold the Property via an auction and sale transaction (the “**Sale**”) to Romspen Mortgage Limited Partnership (the “**Lender**”). *See* ECF No. 278. The Sale closed on October 15, 2020. *See* ECF No. 284.

#### **B. Overview of Bankruptcy Case**

5. Wick Phillips assisted the Trustee with obtaining a return in excess of 80% to holders of general unsecured claims in this Case, a remarkable result where the primary asset was real estate that was pledged as collateral to a very under-secured lender. At the hearing on confirmation of the Trustee’s plan, the Court remarked: “*You did a really good job, Trustee, and everyone else, getting everybody on the same page and I recognize that, believe me.*” The Court added: “*I agree with the Trustee that it is pretty remarkable when you look at it just in the abstract where it was when this chapter 11 case started and what general unsecured creditors are going to get under the plan.*”

6. Since the Trustee’s appointment, the Trustee and his professionals focused on maximizing the value of the Property through preservation and enhancement tasks while preparing to market the Property for sale.

7. With the Applicant’s assistance, the Trustee communicated extensively with parties in interest in the Case and their counsel as well as brokers, vendors and service providers with preexisting knowledge and familiarity with the Debtor and the Property. With the assistance of his counsel and financial advisors, the Trustee investigated and analyzed various types of maintenance and value enhancement proposals identified by many parties in interest in the Case.

8. The Trustee ultimately determined that the Estate required financing and obtained such financing from the Lender. Applicant assisted the Trustee in negotiating the terms of the Credit Facility that enabled the Trustee to preserve and enhance the value of the Property.

9. In pursuit of his preservation and enhancement activities, the Trustee has, with the Applicant's assistance, evaluated multiple options for professionals, consultants, contractors, and other parties to assist, and considered many restructuring options to determine which would best serve the Estate. Ultimately, the Trustee elected to conduct a vigorous marketing process which resulted in the Sale.

10. Wick Phillips also prepared numerous retention applications of various professionals (ECF Nos. 54, 55, 63, 137, 154) and assisted in the broker marketing process. Wick Phillips also spent a significant amount of time preparing for and responding to multiple creditors' limited objection to the Trustee's Emergency Motion to Obtain Secured Credit on an Interim and Final Basis (ECF Nos. 66, 93, 100, 101, 102, 103, 119), as well as participating in negotiations with the Lender, the Debtor's equity holders, creditors, and other parties in interest on a wide variety of topics.

11. Most recently, Wick Phillips assisted the Trustee with drafting and proposing a liquidating plan and disclosure statement based on a global resolution of most of the remaining disputes in the Case. In short, the Case is proceeding efficiently toward a resolution in the best interests of the Estate's creditors, and Wick Phillips has played a prominent role in getting to this point.

12. With the assistance of counsel, the Trustee negotiated an extensive settlement of the Estate's potential claims against the Lender in exchange for funding a substantial recovery to general unsecured creditors, then proposed a liquidating plan with the final goal of exiting

bankruptcy. The Trustee sought a rapid and efficient confirmation of his proposed plan and additionally negotiated a settlement of the Estate's disputes with Dan White, one of the Debtor's partners. The Court confirmed the Trustee's plan of liquidation on January 26, 2021, and the plan went effective on February 2, 2021. The plan provides a distribution of no less than 80% to holders of general unsecured claims. The Trustee anticipates making distributions to holders of general unsecured claims within the next ninety days.

**C. Employment and Prior Compensation**

13. By application dated May 13, 2020 (the "**Retention Application**"), the Trustee requested Court approval of his retention and employment of Wick Phillips from the Appointment Date through the pendency of the chapter 11 case. On June 8, 2020, upon consideration of that application, together with the supporting affidavit, this Court entered an order approving the Trustee's employment of Wick Phillips (ECF No. 86, the "**Retention Order**").<sup>1</sup> Pursuant to Local Rules, Wick Phillips has served as the Trustee's bankruptcy counsel since the Appointment Date.

14. Under the Fee Procedures Order, "all professionals in this Case pursuant to this [Fee Procedures] order of the Court may seek compensation for professional services rendered and reimbursement of expenses incurred in accordance with the following Compensation Procedures." See Fee Procedures Order, ¶ 2. Pursuant to the Compensation Procedures in the Fee Procedures Order, Wick Phillips made monthly requests for the Trustee to pay fees and expenses in the aggregate amount of \$732,491.31 and received no objections. Thus, under the Fee Procedures Order, the Trustee has made prior payments to Wick Phillips totaling \$732,491.31.

15. Wick Phillips filed its *First Interim Application for Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred from April 22, 2020 through*

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<sup>1</sup> A copy of the Retention Order is attached hereto as **Exhibit B**.

*September 30, 2020* (ECF No. 304, the “**First Interim Application**”) on November 10, 2020. The Court granted the First Interim Application by Order dated December 7, 2020 (ECF No. 332, the “**First Interim Order**”). The Trustee subsequently paid Wick Phillips \$98,386.20, the amount authorized under the First Interim Order. Combined with the amounts the Trustee paid Wick Phillips under the Fee Procedures Order, Wick Phillips has been paid a total of \$830,877.51 for its fees and expenses incurred during the Case.

16. Wick Phillips has not entered into any agreement, express or implied, with any other party for the purpose of fixing or sharing fees or other compensation to be paid for professional services rendered in this Case.

17. No promises have been received by Wick Phillips or any member thereof as to compensation in connection with this Case other than in accordance with the provisions of the Bankruptcy Code.

**D. Compensation Requested**

18. This Application requests (i) approval of fees in the amount of \$917,543.50 and expenses in the amount of \$15,983.75 for the Application Period, and (ii) authorization for the Trustee to pay Wick Phillips \$102,649.74, which is the amount remaining due to Wick Phillips after accounting for the Trustee’s prior disbursements under the Fee Procedures Order and the First Interim Order.

19. Wick Phillips’ billed charges for professional services rendered in this Case in accordance with Wick Phillips’ existing billing procedures. Wick Phillips charged the same rates for the services rendered by its professionals in this chapter 11 Case that Wick Phillips charges for professional services rendered in comparable bankruptcy and non-bankruptcy related matters and are reasonable based on the customary compensation charged by comparably skilled professionals in comparable cases in a competitive national legal market.

20. Wick Phillips submits that this Application complies with sections 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules, the Bankruptcy Local Rules and the United States Trustee Guidelines. The fees sought by this Application during the Application Period reflect an aggregate of attorneys and paralegals time spent and recorded in performing services for the Trustee during the Application Period, at a blended hourly rate of \$474.08.

## II. FEE AND COST RECORDS

21. In support of this Application, the following documents are attached:

- a. As a cover sheet, a Fee Application Summary (the “**Fee Application Summary**”), which includes a summary describing services rendered by category and the total cost of each category of services by professional is attached to the front of this Application;
- b. As **Exhibit B**, a copy of the Retention Order;
- c. As **Exhibit C**, a copy of Wick Phillips’ computerized time-keeping records of the time expended in the rendition of the professional services the Trustee required, which set forth a detailed description of services performed by each professional on behalf of the Trustee;
- d. As **Exhibit D**, a chart reflecting the aggregate of the time expended by each professional and their billing rate; and
- e. As **Exhibit E**, a summary of the amounts and categories of expenses for which Wick Phillips seeks reimbursement.
- f. As **Exhibit F**, a summary of Mr. Rudd’s and Mr. Lawrence’s qualifications, experience and credentials.

22. The bulk of the expenses relate to photocopying, travel, and postage. Copies of all receipts or invoices relating to outside or third-party expenses in excess of \$100.00 will be made available upon request. Pursuant to the Retention Order and subject to Bankruptcy Court approval, Wick Phillips is entitled to reimbursement of actual and necessary expenses incurred in the rendition of its services to the Trustee. In explanation of certain expense categories, Wick Phillips states as follows:

- a. Copying. For third party copying and printing, Wick Phillips passes on these charges at cost. For this matter, the vendor charged 20 cents per page for photocopying in accordance with U.S. Trustee guidelines.
- b. Online Research. Charges for use of Westlaw and other on-line research tools are charged only to clients whose situation require the use of such tools, thus reducing costs to the clients as much as possible. Those on-line services are invaluable for up-to-date research, allowing rapid access to numerous resources that might otherwise be difficult to obtain. The charges are at a rate Wick Phillips routinely and customarily charges its clients and is a cost that cannot easily be determined by most professionals.
- c. Postage and Delivery Services. Wick Phillips charges for standard postage for First Class United States Mail. On occasion, overnight or hand-delivery of documents and other materials is required to expedite receipt of critical documents or information. Wick Phillips charges the client the cost of such service. There is no charge when an employee of Wick Phillips hand delivers packages; a procedure which is employed whenever possible.
- d. Exhibit Binders. Wick Phillips hired a third-party copy service provider to produce exhibit binders for the Court and witnesses for hearings.
- e. Court Reporting – Auction. Wick Phillips hired a court-reporter and auction-support staff to assist in hosting and transcribing the auction of the Property.
- f. Travel, Meals & Entertainment. Wick Phillips’ professionals were required to attend meetings and travel to meet with the Trustee and other parties in interest.
- g. Electronic Discovery and Data Hosting. Wick Phillips engaged a third-party discovery hosting service, Inventus, to assist with hosting and making available to certain parties in the case documents and other discovery they requested.

23. Wick Phillips has made every effort to minimize its disbursements in this Case. The expenses incurred in the rendition of professional services are necessary, reasonable and justified under the circumstances to serve the needs of the Trustee, the Debtor, its Estate and creditors.

24. During the Application Period, Wick Phillips has primarily focused its efforts in the following areas: (a) assisting the Trustee in managing the Debtor’s chapter 11 case, (b) obtaining approval of the retention of professionals necessary for a successful bankruptcy case, (c) assisting the Trustee with conducting the marketing and sale process for the Property, (d)

negotiating and preparing the Plan of Liquidation and Disclosure Statement, (e) confirming the Plan, (f) representing the Trustee before the Court and (g) communicating with parties-in-interest.

25. In connection with recording time entries, Wick Phillips established task codes in conformance with the U.S. Trustee Guidelines. While Wick Phillips attempted to record its time entries under each of the discrete task codes, certain matters had characteristic that related to several task categories. Additionally, as Wick Phillips continued to work on a matter, the related task may have changed, such that recording time in the same category was no longer appropriate, although the description of the task may remain substantially similar to previous time entries.

26. The following is a summary of significant professional services rendered by Wick Phillips during the Application Period.

<b>Category</b>	<b>Fees</b>	<b>Hours</b>
Asset Analysis & Recovery	\$ 47,407.50	89.7
Asset Disposition	\$ 114,593.00	232.0
Assumption & Rejection of Leases / Contracts	\$ 5,978.00	13.4
Budgeting (Case)	\$ 654.00	1.5
Business Operations	\$ 21,072.00	47.5
Case Administration	\$ 5,839.00	22.6
Claims Administration & Objections	\$ 81,051.50	165.1
Corporate Governance & Board Matters	\$ 504.00	0.9
Employment and Fee Applications	\$ 92,850.50	231.6
Employment and Fee Application Objections	\$ 2,856.00	5.1
Financing & Cash Collateral	\$ 111,645.00	242.1
Litigation: Contested Matters & Adv. Proc.	\$ 20,570.00	42.0
Meetings & Communications with Creditors	\$ 7,044.00	13.3
Non-Working Travel <sup>2</sup>	\$ 1,008.00	1.8
Plan and Disclosure Statement	\$ 320,600.00	653.7
Real Estate	\$ 4,451.50	8.5
Relief from Stay and Adequate Protection	\$ 1,484.00	3.2
Reporting	\$ 10,116.00	27.2
Tax	\$ 210.00	0.5
Challenge Investigation	\$ 67,609.50	133.7
<b>Totals</b>	<b>\$ 917,543.50</b>	<b>1935.4</b>

<sup>2</sup> Time attributable to Non-Working Travel is part of the Non-Charges as defined in the Fee Application Summary.



**A. Expenses<sup>3</sup>**

27. Wick Phillips used this matter code for expenses charged to the Trustee, which mainly consisted of photocopying, exhibit binders, postage, delivery services, online research, travel, and transcription and auction support services.

**B. Asset Analysis & Recovery<sup>4</sup> and Asset Disposition<sup>5</sup>**

28. Wick Phillips worked to identify and secure the Estate's assets, the largest one being the Property. In regard to the Property, Wick Phillips used these matter codes to assess the status of the Property and the Property's insurance policies and advance the sale process of the Property.

29. Wick Phillips also used these matter codes to advance discussions on the Trustee's broker retention selection; draft the Trustee's Motion for Entry of Orders (I) Authorizing and Approving (a) Bid Procedures, and (b) Form and Manner of Notices for the Bid Procedures and Resulting Sale; (II) Scheduling an Auction to Determine the Highest and Best Offer; (III) Scheduling a Hearing to: (a) Approve the Sale of Assets to the Successful Bidder Free and Clear of Liens, Claims and Encumbrances, and (b) Authorize Assumption of Assignment of Executory Contracts and Unexpired Leases in Connection with the Sale; and (IV) Granting Related Relief (ECF No. 175); and conduct legal research on potential avoidance actions and the removal and applicability of certain potential claims and causes of action belonging to the Estate.

30. After receiving approval of bid procedures, the Trustee and his broker were able to conduct an auction including bids from both the Lender and the White Parties that offered

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<sup>3</sup> The professionals at Wick Phillips primarily utilized the matter code of 01 relating to these services.

<sup>4</sup> The professionals at Wick Phillips primarily utilized the matter code of 03 relating to these services.

<sup>5</sup> The professionals at Wick Phillips primarily utilized the matter code of 04 relating to these services.

substantial value to the Estate. Ultimately, the Trustee determined that the Lender's credit bid of \$45 million was the highest and best bid, on which bid the Trustee subsequently closed in October.

**C. Assumption & Rejection of Leases / Contracts<sup>6</sup>**

31. Under this matter number, Wick Phillips worked to analyze and negotiate the terms of a potential rejection or assumption of the Estate's contract with its general contractor, Panache Development and Construction, and issues related with each option.

**D. Business Operations<sup>7</sup>**

32. Under this matter number, Wick Phillips billed for tasks related to the Debtor's business operations. Specifically, Wick Phillips developed budgets, allotted some of the Debtor's funds for emergency expenditures, analyzed budget compliance, and planned for preservation activities related to the Property. A significant amount of Wick Phillips' fees billed to this matter code related to the Debtor's critical vendors, including conducting activities related to preparing the critical vendor motion and list of critical vendors, analyzing critical vendor claims and reviewing proposed critical vendor payments, drafting and revising proposed vendor agreements, and corresponding with various individuals regarding these matters.

**E. Case Administration<sup>8</sup>**

33. Wick Phillips sought to minimize the amount of time billed under this matter in this Case, which mostly relates to administrative tasks conducted to ensure the progress of the Case. For example, Wick Phillips' attorneys used this matter code to bill for their time spent identifying, discussing, and delegating outstanding case items and next steps involving the Case.

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<sup>6</sup> The professionals at Wick Phillips primarily utilized the matter code of 05 relating to these services.

<sup>7</sup> The professionals at Wick Phillips primarily utilized the matter code of 08 relating to these services.

<sup>8</sup> The professionals at Wick Phillips primarily utilized the matter code of 09 relating to these services.

**F. Claims Administration<sup>9</sup>**

34. Wick Phillips assisted the Trustee with analyzing the legal strengths and weaknesses of various claims in the Case to assist in negotiations with claimants and other parties in interest related to classification and settlement of claims. Wick Phillips assisted the Trustee to identify, analyze, investigate, and ultimately object to the entirety of each asserted secured claim as listed by the Debtor in its schedules. Wick Phillips also assisted the Trustee with other claims objections to satisfied claims, and also worked with the Trustee to resolve some claims objections consensually via stipulations, negotiated resolutions for claims to be satisfied by non-Estate parties, and other creative solutions that inured to the benefit of creditors of the Estate.

**G. Employment and Fee Applications & Objections<sup>10</sup>**

35. Wick Phillips assisted the Trustee in employing professionals under this matter number. Wick Phillips worked with the Trustee to finalize and file an Application to Employ Wick Phillips (ECF No. 54), which the court granted Wick Phillips' employment as counsel for the Trustee (ECF No. 86).

36. On May 13, 2020, Wick Phillips filed an Application for Entry of an Order Pursuant to 11 U.S.C. §§156(a) and 363(b) for Employment and Retention of HMP Advisory Holdings, LLC d/b/a Harney Partners as Financial Advisors to the Trustee (ECF No. 55), and on June 8, 2020, the Court entered its order approving the Application (ECF No. 87).

37. On May 19, 2020, Wick Phillips filed an Application for Order Authorizing (I) Employment of Sprouse Shader Smith PLLC as Special Counsel to the Trustee and Estate Effective *Nunc Pro Tunc* to the Petition Date and (II) to Pay Prepetition Claims of Sprouse Shrader

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<sup>9</sup> The professionals at Wick Phillips primarily utilized the matter codes of 10 relating to these services.

<sup>10</sup> The professionals at Wick Phillips primarily utilized the matter codes of 13 and 14 relating to these services.

Smith PLLC (ECF No. 63), and on June 19, 2020, the Court entered an order approving the Application (ECF No. 124).

38. On June 10, 2020, Wick Phillips filed an Application for Order Authorizing Employment of Foran, O'Toole, & Burke LLC as Special Counsel to the Trustee and Estate (ECF No. 90). The court authorized the employment on June 18, 2020. (ECF No. 121).

39. On June 25, 2020, Wick Phillips filed an Application for Entry of an Order Pursuant to 11 U.S.C. §§ 327(a) and 328(b) for Employment and Retention of Cushman & Wakefield U.S., Inc. as Real Property Broker Effective as of June 19, 2020 (ECF No. 137), and on July 27, 2020, the Court entered its order approving the Application (ECF No. 160).

40. On July 9, 2020, Wick Phillips filed an Application for Order Authorizing Employment of Gindler, Chappell, Morrison & Co. PC to the Trustee and Estate (ECF No. 154). The court authorized the employment on August 6, 2020. (ECF No. 171).

#### **H. Financing & Cash Collateral<sup>11</sup>**

41. As the Debtor's redevelopment project remained incomplete on the Petition Date, the Estate generated no cash flow to fund maintenance of the Property and its improvements, administration of the Estate, or otherwise to preserve value to permit the sales process to advance. Accordingly, the Trustee required access to cash to avoid immediate and irreparable harm to the Estate that would result if the Trustee was unable to fund the chapter 11 process or maintain the Property. Wick Phillips represented the Trustee in negotiating and filing a motion seeking approval of postpetition financing from the Lender to fund these critical efforts and the administration of the Estate.

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<sup>11</sup> The professionals at Wick Phillips primarily utilized the matter code of 15 relating to these services.

42. On May 18, 2020, Wick Phillips filed the Trustee's Emergency Motion to Obtain Secured Credit on an Interim and Final Basis (ECF No. 57). The Court then held a hearing on the Trustee's Emergency Motion to Obtain Secured Credit on an Interim and Final Basis.

43. On May 21, 2020, the Court granted an Interim Order on the Trustee's Emergency Motion to Obtain Secured Credit on an Interim and Final Basis (ECF No. 73). Wick Phillips also had to prepare for and respond to multiple creditors' limited objection to the Trustee's Emergency Motion to Obtain Secured Credit on an Interim and Final Basis (ECF Nos. 66, 93, 100, 101, 102, 103, 119). On June 30, 2020, the Court entered its Amended Final Order Granting Chapter 11 Trustee's Motion to Obtain Secured Credit on an Interim and Final Basis (ECF No. 144, the "Final Financing Order").

44. Wick Phillips also worked with the Lender to extend various deadlines contained in the Final Financing Order on several occasions (ECF Nos. 157, 178, 197, 235, 286). Ultimately, Wick Phillips assisted the Trustee with ensuring that the Estate was fully funded, including with respect to the administration of the post-confirmation trust. Wick Phillips assisted the Trustee with achieving a negotiated settlement with the Lender that concluded the Estate's need for further extensions of the challenge period, in exchange for a recovery to general unsecured creditors in excess of 80%, among other valuable consideration.

#### **I. Litigation: Contested Matters & Adversary Proceedings<sup>12</sup>**

45. Throughout the Case, the Trustee and his professionals have had to respond to numerous objections and contested matters. One of the contested matters was the Trustee's Emergency Motion to Obtain Secured Credit on an Interim and Final Basis (ECF No. 73). The

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<sup>12</sup> The professionals at Wick Phillips primarily utilized the matter code of 16 relating to these services.

Trustee and his professionals worked on responding to creditors' limited objections (ECF Nos. 66, 93, 100, 101, 102, 103, 119).

46. Wick Phillips continued to assist the Trustee in investigating potential claims and causes of action against the Lender, the White Parties, and other potential sources of recovery for the benefit of the creditors of the Estate. As mentioned above, through extensions of challenge periods, extensive discovery and investigation, Wick Phillips was able to assist the Trustee to achieve negotiated settlements, embodied in the Plan, that resolved the Estate's valuable claims in exchange for a remarkable recovery to creditors in the Case.

**J. Meetings & Communications with Creditors<sup>13</sup>**

47. Wick Phillips' professionals mainly used this matter code to bill for various phone conferences and correspondences with creditors in the Case.

**K. Plan and Disclosure Statement<sup>14</sup>**

48. During the Application Period, Wick Phillips professionals counseled the Trustee regarding terms of a Plan and worked to negotiate and advance proposed settlement and agreeable plan treatment for the Debtor's key creditor groups and to expedite the confirmation process.

49. Much of Wick Phillips' time billed to this matter code related to Wick Phillips' efforts to prepare the Plan and Disclosure Statement. The Plan and Disclosure Statement required significant time to revise and incorporate the details of various negotiated settlements between the Trustee and parties in interest, most prominently the Lender, the Debtor's general contractor, Panache Development and Construction, Inc., and certain parties asserting liens against property of the Estate.

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<sup>13</sup> The professionals at Wick Phillips primarily utilized the matter code of 17 relating to these services.

<sup>14</sup> The professionals at Wick Phillips primarily utilized the matter code of 19 relating to these services.

50. Another sizeable component that was billed to this matter code was the time Wick Phillips' attorneys spent representing the Trustee in mediation with the key parties in interest to advance agreeable terms for the Plan and Disclosure Statement.

51. Wick Phillips assisted the Trustee with formulating, drafting, revising, soliciting acceptances for, modifying, and ultimately confirming the Plan in this Case, which embodies and captures the value that Wick Phillips and the Trustee fought for via their investigations, settlements, stipulations, claims objections, and other work in the Case. General unsecured creditors in the Case stand to receive a distribution in excess of 80% in the Case, in significant part because of Wick Phillips' efforts.

**L. Real Estate<sup>15</sup>**

52. Wick Phillips professionals billed their time to this matter number for assisting in the preparation of a Property Condition Assessment in connection with the marketing and sale of the Property, as well as supporting the Trustee's efforts to enhance the value of the Property through the PDA and TxDOT negotiations.

**M. Reporting<sup>16</sup>**

53. Wick Phillips professionals billed their time to this matter number for assisting in the preparation of Monthly Operating Reports, budgets, variance reports, and other reporting reports required by the Bankruptcy Code, the Bankruptcy Rules, and this Court's orders.

**N. Challenge Investigation<sup>17</sup>**

54. Wick Phillips professionals billed their time to this matter number for any time they spent on tasks related to investigating the Lender's liens, claims and the Debtor's claims against

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<sup>15</sup> The professionals at Wick Phillips primarily utilized the matter code of 20 relating to these services.

<sup>16</sup> The professionals at Wick Phillips primarily utilized the matter code of 22 relating to these services.

<sup>17</sup> The professionals at Wick Phillips primarily utilized the matter code of 25 relating to these services.

the Lender. Wick Phillips continued to assist the Trustee in investigating potential claims and causes of action against the Lender, the White Parties, and other potential sources of recovery for the benefit of the creditors of the Estate. As mentioned above, through extensions of challenge periods, extensive discovery and investigation, Wick Phillips was able to assist the Trustee to achieve negotiated settlements, embodied in the Plan, that resolved the Estate's valuable claims in exchange for a remarkable recovery to creditors in the Case.

**O. Other Matter Codes**

55. Wick Phillips also billed to other matter codes not detailed above. In relation to the above-outlined matter codes, Wick Phillips spent minimal time billing to the following matter codes:

- a. Budgeting (Case) (matter code 07): 1.5 hours, \$654.00;
- b. Corporate Governance and Board Matters (matter code 11): 0.9 hours, \$504.00;
- c. Relief from Stay and Adequate Protection (matter code 21): 3.2 hours, \$1,484.00;
- d. Tax (matter code 23): 0.5 hours, \$210.00.

**III. LEGAL STANDARDS**

56. Pursuant to section 330 of the Bankruptcy Code, this Court may award to professional persons employed under section 327 reasonable compensation for actual, necessary services rendered and reimbursement for actual, necessary expenses incurred.

57. The Fifth Circuit has “made clear that the lodestar, *Johnson* factors, and § 330 [of the Bankruptcy Code] coalesce[ ] to form the framework that regulates the compensation of professionals employed by the bankruptcy estate.” *In re Pilgrim's Pride*, 690 F.3d 650, 656 (5th Cir. 2012).

58. “Under this framework, bankruptcy courts must first calculate the amount of the lodestar.” *Id.* To apply the lodestar approach, the Court determines a reasonable attorney fee in a



case by multiplying the number of hours expended by an hourly rate. *Pennsylvania v. Delaware Valley Citizens' Counsel for Clean Air*, 478 U.S. 456 (1987).

59. After calculating the lodestar, the Court “then may adjust the lodestar up or down based on the factors contained in § 330 and [its] consideration of the twelve factors listed in *Johnson*.” *Pilgrim's Pride*, 690 F.3d at 656 (quoting *In re Cahill*, 428 F.3d 536, 540 (5th Cir. 2005)).

60. Section 330 of the Bankruptcy Code instructs the Court to “tak[e] into account all relevant factors, including—

- a. The time spent on such services;
- b. The rates charged for such services;
- c. Whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;
- d. Whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed;
- e. With respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and
- f. Whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

*Pilgrim's Pride*, 690 F.3d at 655-56 (quoting 11 U.S.C. § 330(a)(3)).

61. The twelve *Johnson* factors include the time and labor required; the novelty and difficulty of the questions; the skill requisite to perform the legal service properly; the preclusion of other employment by the attorney due to acceptance of the case; the customary fee; whether the fee is fixed or contingent; time limitations imposed by the client or circumstances; the amount involved and the results obtained; the experience, reputation and ability of the attorneys; the

undesirability of the case; the nature and length of the profession of relationship with the client; and awards in similar cases. *See Johnson v. Georgia Highway Express, Inc.*, 488 F.2d 714, 717-19 (5th Cir. 1974).

62. Under each of the guidelines, Wick Phillips submits the fees requested herein are fair and reasonable.

#### **IV. APPLICATION OF GUIDELINES**

63. As required by the first step of the two-step analysis imposed by section 330(a)(1) analysis, all services rendered in this Case by Wick Phillips were necessary and appropriate. The actions taken by Wick Phillips were essential to the Trustee's success in preserving the value of the assets for the Estate.

64. Likewise, with respect to the second step of the analysis, the compensation sought by Wick Phillips is competitive. Wick Phillips also extensively utilized non-billing personnel to provide the attorneys with support. Wick Phillips' staffing decisions resulted in efficient case management. The issues in this bankruptcy case have been addressed promptly, properly and with no duplication.

65. Under the lodestar method, in aggregate, Wick Phillips rendered during the Application Period 1935.4 hours of service at an overall blended hourly rate of \$474.08. Wick Phillips has provided effective representation at minimal expense. The issues in this Case have been addressed by drawing on the expertise of Mr. Rudd, not by extensive hours in a library or litigating.

66. The twelve *Johnson* factors also support approval of the fees requested in these cases.

- a. Time and Labor Required. Wick Phillips expended 1935.4 hours to represent the Trustee in the Application Period. Because of Wick Phillips' desire to minimize duplication, the vast majority of the billed attorney time was incurred by partner Jason

M. Rudd, whose expertise in bankruptcy matters ensured such work was done as efficiently as possible, and associate Scott D. Lawrence, whose lower billable rate ensured time-intensive tasks were performed as inexpensively as possible while still being handled with the appropriate level of skill and expertise required.

- b. Novelty and Difficulty of the Questions. Representation of the Trustee and the size of this bankruptcy case involved difficult issues and negotiations with many different parties.
- c. Skill Required. This Case requires a high amount of skill because of its size, speed and the need to, among other things, negotiate a variety of complicated issues that arose with various creditors.
- d. Preclusion of Other Employment. This representation has not caused significant dislocation or preclusion of other employment by Wick Phillips.
- e. Customary Fee. If this Case were not one under the Bankruptcy Code, Wick Phillips would charge the Trustee, and expect to receive on a current basis, an amount at least equal to the amounts herein requested for the professional services rendered. The rates charged in this Case are either standard rates or rates that are reduced from standard rates for the respective timekeepers. Wick Phillips represents and would demonstrate that the fees are competitive for this region and customary for the degree of skill and expertise required in the representation of the Trustee by other experienced bankruptcy practitioners and other professionals in this district.
- f. Fixed or Contingent Fee. Wick Phillips accepted this representation on an hourly basis, which was approved by the Bankruptcy Court. Due to expected amount of time, collection of all amounts beyond the initial retainer are, by their nature, contingent.
- g. Time Limitations. As this Court is aware, “emergency” motions have been filed in this Case. Thus, Wick Phillips has been required to attend to various issues as they have arisen. Occasionally, Wick Phillips has had to perform those services under significant time constraints requiring attorneys and paralegals assigned to the case to work many evenings and weekends.
- h. Amounts and Results. Wick Phillips assisted the Trustee in preserving the Estate’s assets and maximizing the recovery from those assets. Specifically, Wick Phillips represented the Trustee in completing the sale and disposition of the Estate’s principal asset, the Property, obtaining millions of dollars in postpetition financing and in formulating and filing a proposed plan and disclosure statement. As a result, the Trustee anticipates a meaningful recovery to unsecured creditors in this case.
- i. Experience, Reputation and Ability. Mr. Rudd and Mr. Lawrence are highly experienced in debtor, creditor, and Trustee representations and have been actively involved in many bankruptcy cases in the Western District of Texas and elsewhere. The attorneys at Wick Phillips enjoy a reputation as providing quality legal services without

inefficiencies and duplications which occasionally occur in representations by larger firms. Attached as **Exhibit F** are the biographies of Mr. Rudd and Mr. Lawrence, the attorneys who primarily provided services to the Trustee.

- j. Undesirability of the Case. At the onset of this Case, the Estate lacked any cash on hand, unencumbered property or means to fund the Trustee's professional fees, including Wick Phillips' fees and expenses. Wick Phillips accepted this engagement with meaningful risk of non-payment as an undesirable feature of this Case.
- k. Relationship with Client. As disclosed more fully in the Retention Application, Wick Phillips and the Trustee's firm, Harney Partners, have been involved in some of the same matters previously, and Wick Phillips has represented Harney Partners in other, unrelated matters.
- l. Awards in Similar Cases. The compensation sought by Wick Phillips in this Case is the commensurate rates sought by professionals in other cases in this district.

## V. CONCLUSION

For the foregoing reasons, Wick Phillips Gould & Martin, LLP requests that the Court:

- (i) grant approval of all fees in the amount of \$917,543.50 and expenses in the amount of \$15,983.75, for a total award of \$933,527.25 for the Application Period;
- (ii) authorize and direct the Trustee to pay Wick Phillips the outstanding balance due of \$102,649.74; and
- (iii) order such other relief as the Court deems just and proper.

Dated: March 4, 2021

/s/ Scott D. Lawrence

Jason M. Rudd, Tex. Bar No. 24028786  
Scott D. Lawrence, Tex. Bar No. 24087896  
**WICK PHILLIPS GOULD & MARTIN, LLP**  
3131 McKinney Avenue, Suite 500  
Dallas, Texas 75204  
Telephone: (214) 692-6200  
Facsimile: (214) 692-6255  
jason.rudd@wickphillips.com  
scott.lawrence@wickphillips.com

**COUNSEL FOR GREGORY S. MILLIGAN,  
CH. 11 TRUSTEE FOR 3443 ZEN GARDEN, L.P.**

**CERTIFICATE OF SERVICE**

I certify that on March 4, 2021, a true and correct copy of the forgoing was served on the parties listed on the attached service list, either via ECF or United States First Class mail as indicated therein. **Exhibit C** to this Application has not been included with copies served via U.S. mail. Pursuant to L. Rule 2016(b)(2), any party in interest may obtain a copy of **Exhibit C** to this Application at no charge by requesting a copy of it from Scott Lawrence at scott.lawrence@wickphillips.com. **Exhibit C** is also available on PACER at [ecf.txwb.uscourts.gov](http://ecf.txwb.uscourts.gov) for a fee. Furthermore, I directed a third-party service provider to serve the foregoing document(s) via U.S. Mail, first class, postage prepaid, on the parties not otherwise receiving ECF notices, as indicated on the service list attached hereto. Such service will be attested via a supplemental affidavit of service.

/s/ Scott D. Lawrence

# **EXHIBIT A**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

<b>IN RE:</b>  <b>3443 ZEN GARDEN, L.P.</b>  <b>DEBTOR.</b>	§ § § § §	<b>CASE NO. 1:20-10410-HCM</b>  <b>Chapter 11</b>
-------------------------------------------------------------------------	-----------------------	---------------------------------------------------------

**ORDER GRANTING SECOND AND FINAL APPLICATION OF WICK PHILLIPS  
GOULD & MARTIN, LLP, COUNSEL TO TRUSTEE, FOR ALLOWANCE OF  
COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF  
EXPENSES INCURRED FROM APRIL 22, 2020 THROUGH FEBRUARY 2, 2021**

The Court has considered Wick Phillips Gould & Martin, LLP’s (“**Wick Phillips**”) Second and Final Application for Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred from April 22, 2020 through February 2, 2021 (the “**Application**”).<sup>1</sup> The Court finds that (i) it has jurisdiction over the matters raised in the Application pursuant to 28 U.S.C. §§ 157 and 1334; (ii) this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); (iii) the relief requested in the Application is in the best interests of the Estate and its creditors; (iv) proper

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<sup>1</sup> Capitalized terms unless otherwise defined herein shall have the same meaning as ascribed to them in the Application.

and adequate notice of the Application and the hearing thereon has been given and that no other or further notice is necessary; (v) the services of Wick Phillips as counsel for the Trustee were not duplicative of other professional services rendered to the Trustee and the services provided to the Estate resulted in significant benefit and value to the Estate; and (vi) upon the record, after due deliberation, good and sufficient cause exists for the granting of the relief as set forth herein.

IT IS, THEREFORE, ORDERED that the Application is hereby granted.

IT IS FURTHER ORDERED that Wick Phillips is hereby awarded and allowed, on a final basis, fees for reasonable and necessary services to the Estate in the amount of \$917,543.50, and expenses in the amount of \$15,983.75 for the total award amount of \$933,527.25 for the period April 22, 2020 through February 2, 2021.

IT IS FURTHER ORDERED that the Trustee is authorized to pay Wick Phillips the remaining balance of \$102,649.74, which is the remaining outstanding amount not previously paid to Wick Phillips as authorized by this Court's prior orders.

IT IS FURTHER ORDERED that the Court shall retain jurisdiction over any dispute arising from or relating to the implementation of this Order.

###

PREPARED AND SUBMITTED BY:

Jason M. Rudd, Tex. Bar No. 24028786  
Scott D. Lawrence, Tex. Bar No. 24087896  
**WICK PHILLIPS GOULD & MARTIN, LLP**  
3131 McKinney Avenue, Suite 500  
Dallas, Texas 75204  
Telephone: (214) 692-6200  
Facsimile: (214) 692-6255  
jason.rudd@wickphillips.com  
scott.lawrence@wickphillips.com  
**COUNSEL FOR GREGORY S. MILLIGAN,**  
**CH. 11 TRUSTEE FOR 3443 ZEN GARDEN, L.P.**



# **EXHIBIT B**



**IT IS HEREBY ADJUDGED and DECREED that the below described is SO ORDERED.**

**Dated: June 08, 2020.**

  
**H. CHRISTOPHER MOTT**  
**UNITED STATES BANKRUPTCY JUDGE**

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

<b>IN RE:</b>	§	
	§	<b>CASE NO. 1:20-10410-HCM</b>
<b>3443 ZEN GARDEN, L.P.</b>	§	
	§	<b>Chapter 11</b>
<b>DEBTOR.</b>	§	

**ORDER AUTHORIZING  
EMPLOYMENT OF WICK PHILLIPS GOULD & MARTIN LLP  
AS GENERAL COUNSEL TO THE CHAPTER 11 TRUSTEE**

CAME ON FOR CONSIDERATION the *Chapter 11 Trustee's Application for Order Authorizing Employment of Wick Phillips Gould & Martin LLP as Counsel to the Chapter 11 Trustee Effective as of April 22, 2020* (the "Application")<sup>1</sup> filed by Gregory Milligan, Chapter 11 Trustee ("Trustee") of the bankruptcy estate of 3443 Zen Garden, (the "Debtor"), pursuant to Section 327(a) of the Bankruptcy Code, Bankruptcy Rule 2014, Local Bankruptcy Rules 2014 and 2016; and the Court, having considered the Application, the Rudd Declaration, the record in the above-captioned bankruptcy case, and the representations of the Trustee and counsel; and the

<sup>1</sup> Capitalized terms not otherwise defined herein are used as defined in the Application.

Court being satisfied, based on the representations made in the Application and the Rudd Declaration, that Wick Phillips is “disinterested” as that term is defined in section 101(14) of the Bankruptcy Code, and as required under section 327(a) of the Bankruptcy Code; and that Wick Phillips represents no interest adverse to the Estate with respect to the matters upon which it is engaged; and the Court having jurisdiction to consider the Application and the requested relief being a core proceeding pursuant to 28 U.S.C. § 157(b); and it appearing that venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 & 1409; and due and proper notice of the Application having been provided and it appearing that no other or further notice need be provided; and all objections, if any, to the Application have been withdrawn, resolved or overruled; and the Court having determined that the legal and factual bases set forth in the Application establish just cause for the relief granted herein; and it appearing that the relief requested in the Application is in the best interest of the Estate,

IT IS HEREBY ORDERED THAT:

1. The Application is GRANTED.
2. The Trustee is authorized, but not directed, pursuant to Section 327(a) of the Bankruptcy Code, Bankruptcy Rule 2014, Local Bankruptcy Rules 2014 and 2016, to employ and retain Wick Phillips Gould & Martin, LLP as his attorneys in the Case from April 22, 2020 in accordance with Wick Phillips’ normal hourly rates and disbursement policies, all as contemplated in the Application.
3. Wick Phillips is authorized to render professional services to the Trustee related to the Case. Specifically, but without limitation, Wick Phillips will render the following legal services to the Trustee:

- a. advising and assisting the Trustee with respect to fulfilling his duties under sections 704 and 1106 of the Bankruptcy Code, as well as any other duties of the Trustee in the Case;
  - b. advising and consulting on the conduct of the Case, including all of the legal and administrative requirements of operating in chapter 11;
  - c. attending meetings and negotiating with representatives of creditors and other parties in interest;
  - d. taking all necessary actions to protect and preserve the Estate on behalf of the Trustee, including prosecuting actions on the Trustee's behalf, defending any action commenced against the Trustee, and representing the Trustee in negotiations concerning litigation in which the Trustee is involved, including objections to claims filed against the Estate;
  - e. preparing on behalf of the Trustee all necessary and appropriate motions, pleadings, proposed orders, and other documents that are necessary in connection with the Case or the administration of the Estate, including in connection with any adversary proceedings or appeals associated with the Case;
  - f. representing the Trustee in connection with obtaining authority to continue using cash collateral and postpetition financing;
  - g. advising the Trustee in connection with any potential sale of Estate assets;
  - h. analyzing the Debtor's leases and contracts and the assumption and assignment or rejection thereof;
  - i. analyzing and, as appropriate, challenging the validity of liens against assets of the Estate;
  - j. appearing before the Court and any other court to represent the interests of the Estate;
  - k. investigating and prosecuting chapter 5 causes of action and other potential litigation that may be brought by the Trustee;
  - l. formulating, drafting, and obtaining confirmation of a chapter 11 plan and all documents related thereto; and
  - m. all other legal services as may be necessary or appropriate in connection with representing the Trustee in the Case.
4. Wick Phillips shall be compensated in accordance with interim and final fee applications for allowance of its compensation and expenses and shall be subject to sections 330

and 331 of the Bankruptcy Code, the Bankruptcy Rules, the Local Bankruptcy Rules, and any further order of the Court.

5. Wick Phillips shall provide ten-business-days' notice to the Debtors, the U.S. Trustee, and any official committee before any increases in the rates set forth in the Application are implemented and shall file such notice with the Court. The U.S. Trustee retains all rights to object to any rate increase on any grounds, including the reasonableness standard set forth in Section 330 of the Bankruptcy Code, and the Court retains the right to review any rate increase pursuant to Section 330 of the Bankruptcy Code.

6. The Trustee and Wick Phillips are authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Application.

7. Notice of the Application as described in the Certificate of Service contained therein is deemed to be good and sufficient notice of such Application, and the requirements of the Local Bankruptcy Rules are satisfied by the contents of the Application.

8. To the extent the Application or Rudd Declaration is inconsistent with this Order, the terms of this Order shall govern.

9. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

10. The Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

###

PREPARED AND SUBMITTED BY:

Jason M. Rudd

State Bar No. 24028786

Scott D. Lawrence

State Bar No. 24087896

**WICK PHILLIPS GOULD & MARTIN, LLP**

3131 McKinney Avenue, Suite 100

Dallas, Texas 75204

Telephone: (214) 692-6200

Facsimile: (214) 692-6255

**PROPOSED COUNSEL FOR GREGORY MILLIGAN,  
CH. 11 TRUSTEE FOR 3443 ZEN GARDEN, L.P.**

# **EXHIBIT C**

## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200 phone  
(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

June 22, 2020

Invoice No: 122435  
Our File No: 7066-01 JMR  
Billing through: 05/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: 3443 Zen Gardens Bankruptcy

TOTAL FEES	\$214.50
TOTAL DISBURSEMENTS	\$758.46
TOTAL CHARGES FOR THIS BILL	<hr/> \$972.96
NET BALANCE FORWARD	\$0.00
TOTAL BALANCE NOW DUE	<div>\$972.96</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!



Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

June 22, 2020

Invoice No: 122435  
Our File No: 7066-01 JMR  
Billing through: 05/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

3443 Zen Gardens Bankruptcy

Balance forward as of invoice dated	\$0.00
Payments received since last invoice	\$0.00
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$0.00</u>
Trust balance carried forward	\$0.00

FOR PROFESSIONAL SERVICES RENDERED

05/29/2020	BR	Finalize Trustee's motion establishing procedures for interim compensation; serve re same.	1.30 hrs	165 /hr	214.50
Total fees for this matter			1.30 hrs		<u>214.50</u>

DISBURSEMENTS

04/26/2020	Jason Rudd - Out of Town Travel Expenses-Attend transition meeting with Debtor's management and ensure security and condition of property with G. Milligan, From:: 11136 Shortmeadow Drive, Dallas, TX,	245.20
04/26/2020	Jason Rudd - Meals-Breakfast on road to transition meeting at estate's property with G. Milligan	17.78
04/26/2020	Jason Rudd - Meals-Lunch outside Austin for trip to debtor's	18.60
04/27/2020	Jason Rudd - Out of Town Travel Expenses- Tolls for Travel to debtor's office for transition meeting with G. Milligan	2.35
05/22/2020	Copies for Bankruptcy on 05/22/20 BR	214.20
05/31/2020	Postage	224.30
05/31/2020	Online research	36.03
Total disbursements for this matter		<u>\$758.46</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 1 Invoice No: 122435 Invoice through: 05/31/2020
--------------------------------------------------------------------------------------------------------	-------------------------------------------------------------

**BILLING SUMMARY**

TOTAL FEES	\$214.50
TOTAL DISBURSEMENTS	\$758.46
TOTAL CHARGES FOR THIS BILL	\$972.96
NET BALANCE FORWARD	\$0.00
TOTAL BALANCE NOW DUE	\$972.96

Timekeeper Summary

Name	Hours	Rate	Amount
Legal BR Brenda Ramirez	1.30	165.00	\$214.50
Assistant	1.30		\$214.50

Required Notice to Clients.

THE STATE BAR OF TEXAS INVESTIGATES AND PROSECUTES PROFESSIONAL MISCONDUCT COMMITTED BY TEXAS ATTORNEYS. ALTHOUGH NOT EVERY COMPLAINT AGAINST OR DISPUTE WITH A LAWYER INVOLVES PROFESSIONAL MISCONDUCT, THE STATE BAR'S OFFICE OR GENERAL COUNSEL WILL PROVIDE YOU WITH INFORMATION ABOUT HOW TO FILE A COMPLAINT. PLEASE CALL 1-800-932-1900 TOLL-FREE FOR MORE INFORMATION.

## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200 phone  
(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

June 22, 2020

Invoice No: 122436  
Our File No: 7066-20 JMR  
Billing through: 05/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Real Estate

TOTAL FEES	\$1,008.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$1,008.00
NET BALANCE FORWARD	\$0.00
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$1,008.00</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

June 22, 2020

Invoice No: 122436  
Our File No: 7066-20 JMR  
Billing through: 05/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

Real Estate

Balance forward as of invoice dated	\$0.00
Payments received since last invoice	\$0.00
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$0.00</u>
Trust balance carried forward	\$0.00

FOR PROFESSIONAL SERVICES RENDERED

04/28/2020	SDL	Review TxDOT settlement proposal, correspondence and other documents related to potential agreement regarding easements, rights of way, water retention and drainage, and correspondence to G. Milligan and J. Rudd regarding same (.8); call w M .O'Toole regarding same (.8); prepare for and attend call with T. Irion regarding upcoming city counsel meeting regarding project planning approval (.8).	2.40 hrs	420 /hr	1,008.00
Total fees for this matter			<u>2.40 hrs</u>		<u>1,008.00</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP For Professional Services Rendered	Page 1 Invoice No: 122436 Invoice through: 05/31/2020
--------------------------------------------------------------------------------------------------------	-------------------------------------------------------------

**BILLING SUMMARY**

TOTAL FEES	\$1,008.00
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$1,008.00
NET BALANCE FORWARD	\$0.00
TOTAL BALANCE NOW DUE	\$1,008.00

**Timekeeper Summary**

Name		Hours	Rate	Amount	
Associate	SDL	Scott D. Lawrence	2.40	420.00	\$1,008.00
			2.40		\$1,008.00

**Required Notice to Clients.**

THE STATE BAR OF TEXAS INVESTIGATES AND PROSECUTES PROFESSIONAL MISCONDUCT COMMITTED BY TEXAS ATTORNEYS. ALTHOUGH NOT EVERY COMPLAINT AGAINST OR DISPUTE WITH A LAWYER INVOLVES PROFESSIONAL MISCONDUCT, THE STATE BAR'S OFFICE OR GENERAL COUNSEL WILL PROVIDE YOU WITH INFORMATION ABOUT HOW TO FILE A COMPLAINT. PLEASE CALL 1-800-932-1900 TOLL-FREE FOR MORE INFORMATION.

## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200 phone  
(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

June 22, 2020

Invoice No: 122437  
Our File No: 7066-19 JMR  
Billing through: 05/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Plan and Disclosure Statement

TOTAL FEES	\$7,586.50
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$7,586.50
NET BALANCE FORWARD	\$0.00
TOTAL BALANCE NOW DUE	<div>\$7,586.50</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

**Wick Phillips Gould & Martin, LLP**

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

June 22, 2020

Invoice No: 122437  
Our File No: 7066-19 JMR  
Billing through: 05/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Plan and Disclosure Statement**

Balance forward as of invoice dated	\$0.00
Payments received since last invoice	\$0.00
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$0.00</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

05/03/2020	JMR	Draft request for plan proposals from key stakeholders (1.8)	1.80 hrs	560 /hr	1,008.00
05/04/2020	JMR	Strategy conference call with G. Milligan and Trustee team to finalize draft request for strategic plans and related case advancement issues (0.3); analysis of G. Milligan comments to same (0.2); finalize and serve same (0.3)	0.80 hrs	560 /hr	448.00
05/04/2020	SDL	Review draft letter to solicit plan proposals (.2); call with Trustee and financial advisor to discuss revisions to same (.3).	0.50 hrs	420 /hr	210.00
05/08/2020	JMR	Telephone conference with G. Milligan regarding plan options based on Romspin proposal (0.1); correspondence with K. Mercer on same (0.1)	0.20 hrs	560 /hr	112.00
05/09/2020	JMR	Strategy conference call with K. Mercer (petitioning creditors counsel) regarding potential plan structures (0.6); draft outline, update and next steps to G. Milligan and team (0.4); respond to questions on same (0.1)	1.10 hrs	560 /hr	616.00
05/23/2020	JMR	Correspondence with G. Milligan and K. Mercer on status of plan proposal (0.1)	0.10 hrs	560 /hr	56.00
05/25/2020	DGJ	Pursue strategy re. Trustee's Emergency Order re. Solicitation Procedures Motion (1.0); build timeline of deadlines being asked for approval (0.2)	1.20 hrs	335 /hr	402.00
05/25/2020	SDL	Call w D. Heringer regarding solicitation procedures motion.	0.50 hrs	420 /hr	210.00
05/26/2020	DGJ	Prepare draft of Conditional DS Approval & Solicitation Procedures Motion (4.2); begin to prepare proposed order granting Conditional DS	4.50 hrs	335 /hr	1,507.50

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Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP			Invoice No:		122437
For Professional Services Rendered			Invoice through:		05/31/2020
<hr/>					
05/26/2020	SDL	Approval & Solicitation Procedures Motion (0.3) Call and correspondence with D. Heringer regarding solicitation procedures motion.	0.30 hrs	420 /hr	126.00
05/27/2020	DGJ	Continue to prepare proposed order granting Conditional DS Approval & Solicitation Procedures Motion (1.5); prepare notice of conditional approval of disclosure statement and hearing to consider confirmation of chapter 11 plan and related dates (1.0); pursue strategy re. content of Conditional DS Approval & Solicitation Procedures Motion (0.6); prepare Ballot template to be attached to Conditional DS Approval & Solicitation Procedures Motion (1.1)	4.20 hrs	335 /hr	1,407.00
05/27/2020	SDL	Revisions to solicitation procedures and confirmation scheduling motion.	1.40 hrs	420 /hr	588.00
05/28/2020	JMR	Portion of telephone conference with Trustee team on status of plan and related outstanding items with Romspen (0.3); correspondence with T. Scannell on same (0.2).	0.50 hrs	560 /hr	280.00
05/29/2020	JMR	Strategy conference with T. Scannell regarding plan milestones and drafting (0.2); Correspondence with D. Williamson on same (0.2); Telephone conference with D. Williamson, T. Scannell regarding milestone extensions and status of plan drafting (0.5); follow up call with T. Scannell regarding same (0.2)	1.10 hrs	560 /hr	616.00
Total fees for this matter			18.20 hrs		7,586.50



Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 2 Invoice No: 122437 Invoice through: 05/31/2020
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**BILLING SUMMARY**

TOTAL FEES	\$7,586.50
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$7,586.50
NET BALANCE FORWARD	\$0.00
TOTAL BALANCE NOW DUE	\$7,586.50

**Timekeeper Summary**

Name			Hours	Rate	Amount
Associate	DGJ	Daniella G. Heringer	9.90	335.00	\$3,316.50
Partner	JMR	Jason M Rudd	5.60	560.00	\$3,136.00
Associate	SDL	Scott D. Lawrence	2.70	420.00	\$1,134.00
			18.20		\$7,586.50

**Required Notice to Clients.**

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## Wick Phillips Gould & Martin, LLP

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Suite 500  
Dallas, TX 75204  
(214) 692-6200 phone  
(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

June 22, 2020

Invoice No: 122439  
Our File No: 7066-17 JMR  
Billing through: 05/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Meetings and Communications with Creditors

TOTAL FEES	\$2,072.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$2,072.00
NET BALANCE FORWARD	\$0.00
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$2,072.00</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

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June 22, 2020

Invoice No: 122439  
Our File No: 7066-17 JMR  
Billing through: 05/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

Meetings and Communications with Creditors

Balance forward as of invoice dated	\$0.00
Payments received since last invoice	\$0.00
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$0.00</u>
Trust balance carried forward	\$0.00

FOR PROFESSIONAL SERVICES RENDERED

04/29/2020	SDL	Return calls from creditors Ruiz Testing and Hollandstone (.4); correspondence with Trustee regarding calls and related claims (.4).	0.80 hrs	420 /hr	336.00
05/04/2020	JMR	Coordinate Hilco inspection with Romspen counsel, Hilco team and Trustee team (0.2); correspondence and telephone conference with D. Williamson (D. White counsel) on information requests, budget questions, proposals and other issues (1.0); follow up call with G. Milligan on same (0.2)	1.40 hrs	560 /hr	784.00
05/12/2020	JMR	Telephone conference with R. Horton regarding coordination of 341 meeting (0.3); telephone conference with G. Milligan on same (0.1); analysis of schedules and statements in advance of 341 hearing (0.3); Represent Trustee and appear for 341 meeting (1.0)	1.70 hrs	560 /hr	952.00
Total fees for this matter			<u>3.90 hrs</u>		<u>2,072.00</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP For Professional Services Rendered	Page 1 Invoice No: 122439 Invoice through: 05/31/2020
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BILLING SUMMARY

TOTAL FEES	\$2,072.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	\$2,072.00
NET BALANCE FORWARD	\$0.00
TOTAL BALANCE NOW DUE	\$2,072.00

Timekeeper Summary

Name			Hours	Rate	Amount
Partner	JMR	Jason M Rudd	3.10	560.00	\$1,736.00
Associate	SDL	Scott D. Lawrence	0.80	420.00	\$336.00
			3.90		\$2,072.00

Required Notice to Clients.

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Federal Tax No: 45-4183914

June 22, 2020

Invoice No: 122440  
Our File No: 7066-16 JMR  
Billing through: 05/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Litigation: Contested Matters and Adversary  
Proceedings

TOTAL FEES	\$168.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$168.00
NET BALANCE FORWARD	\$0.00
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$168.00</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP  
Please include invoice number on payment. Thank you!

**Wick Phillips Gould & Martin, LLP**

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(214) 692-6255  
Federal Tax ID: 45-4183914

June 22, 2020

Invoice No: 122440  
Our File No: 7066-16 JMR  
Billing through: 05/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

Litigation: Contested Matters and Adversary Proceedings

Balance forward as of invoice dated	\$0.00
Payments received since last invoice	\$0.00
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$0.00</u>
Trust balance carried forward	\$0.00

FOR PROFESSIONAL SERVICES RENDERED

05/15/2020	JMR	Telephone conference with D. White counsel regarding Canada litigation claims belonging to estate and related issues (0.3)	0.30 hrs	560 /hr	168.00
Total fees for this matter			<u>0.30 hrs</u>		<u>168.00</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 1 Invoice No: 122440 Invoice through: 05/31/2020
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**BILLING SUMMARY**

TOTAL FEES	\$168.00
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$168.00
NET BALANCE FORWARD	\$0.00
TOTAL BALANCE NOW DUE	\$168.00

**Timekeeper Summary**

Name	Hours	Rate	Amount
Partner JMR Jason M Rudd	0.30	560.00	\$168.00
	0.30		\$168.00

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Federal Tax No: 45-4183914

June 22, 2020

Invoice No: 122441  
Our File No: 7066-15 JMR  
Billing through: 05/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Financing and Cash Collateral

TOTAL FEES	\$52,173.50
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$52,173.50
NET BALANCE FORWARD	\$0.00
TOTAL BALANCE NOW DUE	<div>\$52,173.50</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!



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(214) 692-6255  
Federal Tax ID: 45-4183914

June 22, 2020

Invoice No: 122441  
Our File No: 7066-15 JMR  
Billing through: 05/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Financing and Cash Collateral**

Balance forward as of invoice dated	\$0.00
Payments received since last invoice	\$0.00
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$0.00</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

04/27/2020	JMR	Telephone conference with Romspen counsel T. Scannell and G. Milligan on options to advance case, background and foundations for next steps (1.0); strategy conference with G. Milligan, S. Lawrence to advance case next steps, advancing budgeting, investigation and key information collection (0.8); follow up call with T. Scannell (0.3); correspondence with Romspen and A. Zarafshani on information requests (0.2).	2.30 hrs	560 /hr	1,288.00
04/27/2020	SDL	Prepare for and participate in call with secured creditor representatives for introductions and potential go-forward financing and strategies (1.1); follow-up call with G. Milligan and J. Rudd regarding same (.8).	1.90 hrs	420 /hr	798.00
04/28/2020	JMR	Analysis of condemnation related background documents (0.3); Strategy conference with M. O'Toole regarding condemnation proceeding (0.8); strategy and background conference with J. Tillotson (D. White counsel) (0.4); strategy conference call with G. Milligan on means to push stakeholders to advance proposals (0.3); conference call with T. Irion and G. Milligan regarding status of zoning and PDA proceedings and next steps (0.5); correspondence with A. Woodham and A. Zarafshani on funding requests, impact of petition date and related issues (0.3); telephone conference with G. Milligan on same (0.2); call to T. Scannell (0.1); correspondence with S. Ayers (0.1); correspondence on budget call,	3.10 hrs	560 /hr	1,736.00

			Page		1
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP			Invoice No:		122441
For Professional Services Rendered			Invoice through:		05/31/2020
04/29/2020	JMR	process and status of same (0.1) Budget conference with A. Zarafshani, counsel, Petitioning creditors counsel and Trustee team to advance cash budget, ensure conservation of funds, prevent claim payment and related issues (0.7); correspondence on budgeting and related follow up (0.2); Telephone conference with T. Scannell (Romspen Counsel) regarding funding mechanism and questions and related issues and developments (0.4); strategy conference with K. Mercer and G. Milligan (0.4); analysis of new follow up information on budgeting (0.3).	2.00 hrs	560 /hr	1,120.00
04/30/2020	JMR	Analysis of draft budget and related background information and correspondence (0.4); telephone conference with G. Milligan, S. Lawrence and and E. White on analysis, revisions, questions and final inputs to same (1.1)	1.50 hrs	560 /hr	840.00
05/01/2020	JMR	Correspondence and call with T. Scanelli regarding status of Romspen advances and loans and related financing issues (0.3)	0.30 hrs	560 /hr	168.00
05/02/2020	JMR	Final review of draft 5 wk DIP budget and correspondence with G. Milligan and team on messaging same to stakeholders (0.5); correspondence with counsel for all stakeholders with draft budget and suggested next steps (0.3); follow up correspondence from D. Williamson on same (0.2); correspondence with Romspen counsel on advancing approval of same (0.2); correspondence with G. Milligan on strategies to address same (0.2)	1.40 hrs	560 /hr	784.00
05/05/2020	JMR	Telephone and coordination conference with G. Milligan and Trustee team regarding advancing funding of project and related urgent items (0.2); correspondence with Romspen counsel on same (0.2); call with Romspen counsel on budget (0.5); follow up startegy discussions with G. Milligan on same (0.3)	1.20 hrs	560 /hr	672.00
05/05/2020	SDL	Begin reviewing documents for inclusion in data room for review by potential financing sources.	2.80 hrs	420 /hr	1,176.00
05/05/2020	SDL	Call with Trustee to discuss financing and next steps.	0.20 hrs	420 /hr	84.00
05/06/2020	JMR	Telephone conference with G. Milligan and trustee team on advancing financing discussions (0.2); correspondence with Romspen counsel on same (0.1)	0.30 hrs	560 /hr	168.00
05/06/2020	SDL	Review 2GB of files from Panache and other sources for inclusion in data room for prospective lenders and other interested parties to review.	6.60 hrs	420 /hr	2,772.00
05/07/2020	JMR	Telephone conference with Trustee team on status of budget and funding requests and related next steps (0.4); telephone conference with Romspen counsel on advancing means to fund Estate (0.4); correpsondence with Trustee team on same (0.3); anlaysis of new offer letter from Petitioning Creditors (0.3).	1.40 hrs	560 /hr	784.00
05/07/2020	SDL	Call with Trustee, E. White and J. Rudd regarding	0.20 hrs	420 /hr	84.00

		Page		2	
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP		Invoice No:		122441	
For Professional Services Rendered		Invoice through:		05/31/2020	
	postpetition financing and data room related to same.				
05/08/2020	JMR	Telephone conference with Trustee regarding strategy on advancing funding proposals and next steps on same (0.3); Telephone conference with Romspen counsel on same (0.2); correspondence on budget with Romspen (0.2); follow up call with G. Milligan on funding structures and options (0.2); analysis of Romspen budget and DIP proposal (0.3); strategy call with G. Milligan to formulate response to same (0.3); telephone conference with Romspen counsel to work out terms for DIP funding and sale related process (0.4); follow up call with G. Milligan on same (0.2)	2.10 hrs	560 /hr	1,176.00
05/08/2020	SDL	Multiple calls and correspondences with Trustee, E. White and J. Rudd concerning case status, need for financing, follow ups with counsel for Romspen, review of proposed budget, review of Romspen revisions to same, and development of counteroffer.	1.40 hrs	420 /hr	588.00
05/11/2020	JMR	Telephone conference with Romspen counsel on DIP terms and proposed pleadings on same (0.2); correspondence with Trustee on same (0.1); analysis of revised ch 11 budget revisions to advance approval of same (0.2); correspondence with Trustee and Debtor's general contractor on same (0.1); analysis of and comment on draft interim DIP Order from Rompsen counsel (2.5); correspondence on same with Trustee team and Romspen counsel (0.2)	3.30 hrs	560 /hr	1,848.00
05/11/2020	SDL	Call with Trustee to discuss status of financing and due diligence process (.4); correspondence with J. Rudd regarding revisions to proposed budget from secured lender (.2).	0.60 hrs	420 /hr	252.00
05/12/2020	JMR	Telephone conference with Trustee regarding advancing DIP Order comments and approval and related updated budget (0.3); approve revised budget and send to Romspen counsel with comments to same (0.3); analysis of Romspen loan documents reference in DIP Order and revise order to address same (1.4)	2.00 hrs	560 /hr	1,120.00
05/12/2020	SDL	Call with Trustee regarding financing with potential lender (.3); correspondence with B. Ramirez regarding due diligence documents (.2); correspondence to J. Rudd regarding negotiations with secured lender (.2); continue review of documents in financing due diligence data room and preparation of index of same (.5).	1.20 hrs	420 /hr	504.00
05/13/2020	JMR	Telephone conference with Trustee and team regrding advancing DIP approval, due diligence and related issues (0.4); Correspondence with Romspen counsel regarding advancing approval of DIP budget and order comments and issues on same (0.7)	1.10 hrs	560 /hr	616.00
05/13/2020	SDL	Continue reviewing and preparing due diligence data room for potential lenders (.5); review and revise non-disclosure agreement related to same (.9); correspondence and call with J. Rudd	2.20 hrs	420 /hr	924.00

		Page		3	
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP		Invoice No:		122441	
For Professional Services Rendered		Invoice through:		05/31/2020	
	regarding revisions to same (.1); correspondence to invite relevant parties to access data room (.3); follow up correspondence with counsel for D. White and Trustee (.4)				
05/14/2020	JMR	Strategy conference with G. Milligan and Trustee team on advancing final budget and DIP order (0.3); correspondence with Romspen counsel on same (0.2); approval and related issues Telephone conference with Romspen counsel regarding negotiation of DIP Order and related budget approval and comments (0.4); strategy and update conference with G. Milligan on same (0.2);	1.10 hrs	560 /hr	616.00
05/14/2020	SDL	Call with Trustee and J. Rudd regarding status of financing offers and preparing to respond quickly to potential DIP financing.	0.20 hrs	420 /hr	84.00
05/15/2020	BR	Prepare debtor in possession financing motion.	1.90 hrs	165 /hr	313.50
05/15/2020	JMR	Strategy call with G. Milligan and Trustee team regarding updates on funding and next steps (0.2); telephone conference with Romspen counsel on approval and final comments to budget and DIP Order (0.3); correspondence with Trustee on same (0.1); follow up call with T. Scannell regarding update on DIP discussions (0.3); analysis of developments and next steps with Trustee team to prepare for final DIP comments and motion (0.4); review and analysis of updated DIP Order and Budget from T. Scannell (0.6); correspondence with trustee team on same (0.3)	2.20 hrs	560 /hr	1,232.00
05/15/2020	JMR	Analysis of Lincoln 1861 proposal on plan and funding and supporting information on same (0.8); portion of call with Trustee on same (0.2); telephone conference with T. Scannell regarding plan options with potential support of petitioning creditors (0.3)	1.30 hrs	560 /hr	728.00
05/15/2020	SDL	Begin draft of motion to approve postpetition financing, including correspondence with B. Ramirez and call with J. Rudd regarding same.	0.50 hrs	420 /hr	210.00
05/16/2020	JMR	Correspondence with Trustee on questions to final DIP negotiations with Romspen (0.3); telephone conference with Trustee on proposed final draft Interim DIP Order, comments and questions on same (1.0); correspondence with Romspen counsel on same (0.2)	1.50 hrs	560 /hr	840.00
05/16/2020	SDL	Review proposed financing order in connection with drafting motion to approve same and in preparation for call with Trustee (1.6); call with Trustee, J. Rudd & E. White to discuss same (1.0); continue research and draft of motion to approve post-petition financing (3.6).	6.20 hrs	420 /hr	2,604.00
05/17/2020	JMR	analysis and comment on draft DIP motion (0.7); telephone conference with Romspen counsel regarding finalizing same, DIP Order revision and related issues (0.3); telephone conference with G. Milligan on final approval of DIP Order and Budget and advancing court approval of same (0.2); correspondence wiht Romspen counsel with final DIP Order comments (0.3)	1.50 hrs	560 /hr	840.00

			Page		4
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP			Invoice No:		122441
For Professional Services Rendered			Invoice through:		05/31/2020
05/17/2020	SDL	Finalize draft of motion to approve financing, including insertion of Rule 4001 requirements and cross-references (4.4); call with J. Rudd and T. Scannell regarding changes to proposed order (.3); draft and circulate motion for emergency hearing and proposed order regarding same (.6); work on attorney checklist related to same (.5); incorporate revisions into drafts of motions and proposed orders and correspondence (.7).	6.50 hrs	420 /hr	2,730.00
05/18/2020	BR	Revise financing motion checklist; prepare motion and order for service; serve re same.	3.70 hrs	165 /hr	610.50
05/18/2020	JMR	Conference call with Trustee team to finalize DIP negotiations and pleadings (0.2); correspondence with Trustee team and Romspen counsel to finalize same (0.3); telephone conference with D. Williamson regarding same (0.2); telephone conference with R. Horton on same (0.1); telephone conference with K. Mercer on same (0.1); telephone conference with G. Milligan on status and approval of filing (0.2)	1.00 hrs	560 /hr	560.00
05/18/2020	SDL	Correspondence to B. Ramirez regarding financing motion checklist (.1); call with Trustee regarding status of motion and next steps (.1); revisions to financing motion checklist (1.2); revisions to proposed order on financing motion (.4); correspondence with J. Rudd and ender's counsel regarding same (.1); revisions to form of order and correspondence with T. Scannell regarding same (.8); finalize financing motion, proposed order, motion for emergency hearing, checklist and related documents for filing and calls and correspondence with J. Rudd and B. Ramirez regarding same (1.8); correspondence with Court regarding hearing scheduling and filing (.4);	4.90 hrs	420 /hr	2,058.00
05/19/2020	JMR	Portion of strategy conference with T. Scannell on DIP hearing preparations (0.3); correspondence with K. Mercer on same (0.1); correspondence with T. Scannell (0.2); anlaysis of K. Mercer comments to proposed DIP Order (0.3); correspondence on same (0.1)	1.00 hrs	560 /hr	560.00
05/19/2020	SDL	Multiple correspondences with the court, J. Rudd and B. Ramirez regarding notice of hearing, amended certificate of service, and certificate of conference related to financing motion (.8); call with J. Rudd, E. White and G. Milligan regarding preparation for hearing on same (.3); begin draft of declaration of G. Milligan in support of approval of financing motion (.5);	1.60 hrs	420 /hr	672.00
05/20/2020	JMR	Analysis of new comments from K. Mercer (0.3); telephone conference with T. Scannell regarding resolution of same (0.5); revise order and circulate to interested parties (0.3); telephone conference with K. Mercer and T. Scannell (0.6); correspondence with trustee team on new comments to order and budget (0.2); telephone conference with D. Williamson on DIP order issues (0.3); correspondence with Romspen and trustee	9.00 hrs	560 /hr	5,040.00

		Page		5	
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP		Invoice No:		122441	
For Professional Services Rendered		Invoice through:		05/31/2020	
	team on same (0.4); correspondence on revised budget inserts (0.4); revise draft Milligan declaration (0.8); Analysis of D. White draft objection to DIP order and outline response to same (0.5); telephone conference with D. Williamson, K. Mercer, T. Scannell regarding resolution and negotiation of DIP Order terms (1.0); follow up call with Trustee on developments on DIP Order (0.2); telephone conference with T. Scannell with options to resolve D. White objections (0.3); review and comment on revised order from T. Scannell (0.5); telephone conference to prepare G. Milligan testimony and court presentation (1.0); continue to draft outline of arguments and evidence, including review of new exhibits and declarations, note specific arguments in response to objections and outline update to court on case developments, among other hearing preparation (1.5); correspondence on receiver request for fees in budget and order (0.2)				
05/20/2020	SDL	Draft declaration of Trustee in support of financing motion (1.8), research regarding legal standards applicable to Trustee declaration and revisions to same (1.3); correspondences with J. Rudd regarding additional exhibits, service of same, and revisions exhibit list throughout day (.3), revise and re-circulate certificate of conference throughout day (.3), correspondence regarding access for Dan White team to data room (.4); teleconference with Trustee, J. Rudd and E. White regarding preparation for hearing (.2); additional development of strategy, conferences, correspondence regarding same, and hearing preparations (1.3); review objection of Dan White parties to financing motion (.5); review declaration of Romspen representative in support of financing motion and exhibits thereto (.4); revisions to notice of revised proposed order and correspondence regarding same (.4), prepare for and conference with D. Williamson, D. Rushing, K. Mercer, T. Scannell, and J. Rudd regarding revisions to proposed financing order (1.0); call and correspondence with B. Ramirez regarding preparation and finalization of exhibits for hearing (.5); correspondence to court and parties in interest regarding declaration and corrected exhibits (.1); multiple correspondences regarding additional conferences, finalize certificate regarding same (.4).	8.90 hrs	420 /hr	3,738.00
05/21/2020	JMR	Finalize outline of arguments for DIP Hearing (1.1); update call with Trustee regarding latest DIP Order comments (0.2); settlement conference with D. Williamson, T. Scannell, K. Mercer, R. Horton regarding resolution of DIP Order language and objections (0.6); revisions to DIP Order to address agreed language and further comments on same (0.8); correspondence with parties in interest on approval of same (0.3); appear for and represent Trustee at DIP Order hearing (1.5); post-hearing revisions to DIP order (0.5); correspondence with G. Milligan regarding next steps to fund DIP and	5.40 hrs	560 /hr	3,024.00

			Page		6
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP			Invoice No:		122441
For Professional Services Rendered			Invoice through:		05/31/2020
		related issues (0.2); coordination call with T. Scannell on same (0.2)			
05/21/2020	SDL	Additional correspondence with court regarding exhibits (.2); call with parties in interest to continue conferring regarding proposed order (.5); review and revise proposed order and preparation of notices and redlines (1.3); support and preparation for hearing (.5); attend hearing on financing motion (1.3); revisions and preparation of final version of interim financing order, notice, and redline of same (.9); correspondence to B. Ramirez regarding service of financing order (.1); correspondence with court regarding same (.1); correspondence regarding same with United States Trustee (.1); correspondence with Trustee regarding next steps (.1); review interim order and correspondence to J. Rudd and B. Ramirez about deadlines and next steps (1.0).	6.10 hrs	420 /hr	2,562.00
05/22/2020	BR	Prepare certificate of service for order; file and serve re same.	1.50 hrs	165 /hr	247.50
05/22/2020	JMR	Trustee team conference call on advancing Final DIP Order preparations, budgeting and related issues (0.3); Correspondence with T. Scannell and Trustee team on funding of DIP Loan (0.1)	0.40 hrs	560 /hr	224.00
05/24/2020	JMR	Correspondence among D. Williamson and T. Scannell regarding DIP provisions and guarnatee issues (0.1)	0.10 hrs	560 /hr	56.00
05/26/2020	JMR	Telephone conference with Trustee and Trustee team to advance Budget preparations for next interim and proposed final DIP Order budgets (0.3); correspondence with T. Scannell and Trustee on structure of funding for subcontractors and vendors under same (0.2)	0.50 hrs	560 /hr	280.00
05/26/2020	SDL	Correspondence to B. Ramirez regarding financing order deadlines and conference with Trustee, E. White and J. Rudd regarding same (.1);	0.10 hrs	420 /hr	42.00
05/27/2020	JMR	Correspondence with G. Milligan regarding budget updates and revisions and advancing approval of same (0.2); correspondence with T. Scannell on advancing milestones and related DIP Order and budget items (0.2)	0.40 hrs	560 /hr	224.00
05/28/2020	JMR	Portion of Trustee team call dedicated to DIP Order and budget discussions and planning (0.3); Review and revise proposed 2nd Interim DIP Budget and correspondence on same (0.3); telephone conference with G. Milligan regarding handling of general contractor to sub-contractor payments and budgeting and flow of funds on same (0.2); follow up correspondence on DIP budget and reporting issues (0.2); portion of telephone conference with T. Scannell regarding status of budget, DIP Order milestone extension and related issues (0.3); correspondence with Trustee team and T. Scannell on funding on WE 05-Jun advance under current budget (0.2)	1.50 hrs	560 /hr	840.00
05/29/2020	JMR	Trustee team strategy discussion regarding budget revisions, funding of DIP loan and related next steps	1.60 hrs	560 /hr	896.00

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Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP		Invoice No:		122441	
For Professional Services Rendered		Invoice through:		05/31/2020	
	(0.4); revisions to 2nd Interim Budget and draft service of same to T. Scannell (0.5); correspondence on approval and service of variance reporting on Romspen (0.2); correspondence on new budget items regarding insurance and electrical work and questions on same (0.3); correspondence with C. Keeble regarding insurance policy coverage and related premium to inform Trustee budgeting decisions on same (0.2).				
05/29/2020	SDL	Review variance report and correspondence to E. White regarding same (.2); review proposed interim budget and correspondence to E. White and Trustee regarding same (.2); call with Trustee, E. White and J. Rudd regarding same (.3); review financing order and correspondence with J. Rudd regarding recipients of variance report (.1); call with T. Scannell, D. Williamson, and D. Rushing regarding case milestones and conferring regarding final hearing on financing motion (.5).	1.30 hrs	420 /hr	546.00
05/31/2020	JMR	Correspondence with G. Milligan regarding comments on DIP Order and budget questions (0.3)	0.30 hrs	560 /hr	168.00
05/31/2020	SDL	Correspondence with J. Rudd and Trustee regarding revisions to financing order for final hearing.	0.30 hrs	420 /hr	126.00
Total fees for this matter			111.60 hrs		52,173.50



Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 8 Invoice No: 122441 Invoice through: 05/31/2020
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**BILLING SUMMARY**

TOTAL FEES	\$52,173.50
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$52,173.50
NET BALANCE FORWARD	\$0.00
TOTAL BALANCE NOW DUE	\$52,173.50

**Timekeeper Summary**

Name			Hours	Rate	Amount
Legal Assistant	BR	Brenda Ramirez	7.10	165.00	\$1,171.50
Partner	JMR	Jason M Rudd	50.80	560.00	\$28,448.00
Associate	SDL	Scott D. Lawrence	53.70	420.00	\$22,554.00
			111.60		\$52,173.50

**Required Notice to Clients.**

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## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200 phone  
(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

June 22, 2020

Invoice No: 122442  
Our File No: 7066-22 JMR  
Billing through: 05/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Reporting

TOTAL FEES	\$6,659.50
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$6,659.50
NET BALANCE FORWARD	\$0.00
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$6,659.50</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

**Wick Phillips Gould & Martin, LLP**

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

June 22, 2020

Invoice No: 122442  
Our File No: 7066-22 JMR  
Billing through: 05/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Reporting**

Balance forward as of invoice dated	\$0.00
Payments received since last invoice	\$0.00
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$0.00</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

04/22/2020	BR	Prepare notices of appearance for JMR and SDL; finalize ex parte motion; file and serve re same.	3.30 hrs	165 /hr	544.50
04/22/2020	JMR	correspondence with K. Mercer on schedules (0.1); review and comment on motion to extend deadline to file schedules (0.3);	0.40 hrs	560 /hr	224.00
04/22/2020	SDL	Draft of application to employ and retain Wick Phillips as counsel to Chapter 11 Trustee (1.1); revise notices of appearance for Wick Phillips on behalf of Chapter 11 Trustee for S. Lawrence and J. Rudd (.2).	1.30 hrs	420 /hr	546.00
04/22/2020	SDL	Correspondence and calls with J. Rudd and G. Milligan regarding status of schedules and responsibility for filing same (.4); research form of motion to extend time for filing schedules, responsibility for same, and applicable deadlines (.5); review applicable bankruptcy rules and local rules regarding same, including rules on expedited and ex parte relief, need for hearing and applicable notice procedures regarding same (.8); draft and revise motion to extend time for debtor to file schedules (1.3); draft and revise proposed order regarding same (.3); additional correspondence and calls with G. Milligan, J. Rudd, U.S. Trustee, and Court regarding same (.9); correspondence to G. Milligan regarding timing of schedules, 341 meeting, and other related deadlines in case (.4); revise and finalize motion to extend time to file schedules and proposed order granting same (.6).	5.20 hrs	420 /hr	2,184.00
04/22/2020	SDL	Correspondence and calls with G. Milligan and J.	2.80 hrs	420 /hr	1,176.00

		Page		1	
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP		Invoice No:		122442	
For Professional Services Rendered		Invoice through:		05/31/2020	
	Rudd regarding 2008 Notice of acceptance of appointment as chapter 11 trustee (.5); research exemplars of same in other cases and review applicable bankruptcy code, rules, local rules, and case law (1.8); draft, revise and finalize notice for G. Milligan's signature (.5).				
04/23/2020	BR	Finalize notice of appointment of chapter 11 trustee; file re same.	0.30 hrs	165 /hr	49.50
04/23/2020	SDL	Review bond, notice of filing of bond, and revise and finalize notice of acceptance of appointment as chapter 11 trustee (.4); additional correspondence with court, United States Trustee, G. Milligan, and J. Rudd regarding motion and order extending time for Debtor to file schedules (.3); correspondence with G. Milligan about responsibilities and obligations for complying with various U.S. Trustee guidelines in the case (.4).	1.10 hrs	420 /hr	462.00
04/24/2020	JMR	Analysis of notes and information and draft follow up memo to A. Zarafshani and R. Horton with noted information requests, outstanding items and IDI and schedules and statements follow up (0.3)	0.30 hrs	560 /hr	168.00
04/30/2020	SDL	Calls with Panache personnel regarding assembly of schedules.	0.30 hrs	420 /hr	126.00
05/01/2020	JMR	Telephone conference with G. Milligan regarding advancing budget approval, retention of professions, insurance issues and related outstanding items and next steps (0.4)	0.40 hrs	560 /hr	224.00
05/04/2020	JMR	Correspondence with Telephone conference with R. Horton regarding initial debtor exam (0.2); preparations for same (0.1)	0.30 hrs	560 /hr	168.00
05/05/2020	JMR	Appear for and represent trustee for initial debtor interview (0.3); telephone conference with R. Horton on reporting questions and issues (0.2); correspondence on same (0.1)	0.60 hrs	560 /hr	336.00
05/07/2020	SDL	Correspondence with Trustee regarding Initial Debtor report (.2); call with Panache personnel completing same to discuss and finalize (.5).	0.70 hrs	420 /hr	294.00
05/20/2020	BR	File monthly operating report; finalize witness and exhibit list; file re same; prepare notice of revised proposed order.	0.70 hrs	165 /hr	115.50
05/20/2020	SDL	Correspondence regarding and review of monthly operating report.	0.10 hrs	420 /hr	42.00
Total fees for this matter			17.80 hrs		6,659.50

Greg Milligan as proposed ch 11 trustee of  
3443 Zen Garden LP  
For Professional Services Rendered

Page 2  
Invoice No: 122442  
Invoice through: 05/31/2020

**BILLING SUMMARY**

TOTAL FEES	\$6,659.50
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	\$6,659.50
NET BALANCE FORWARD	\$0.00
TOTAL BALANCE NOW DUE	\$6,659.50

**Timekeeper Summary**

Name			Hours	Rate	Amount
Legal Assistant	BR	Brenda Ramirez	4.30	165.00	\$709.50
Partner	JMR	Jason M Rudd	2.00	560.00	\$1,120.00
Associate	SDL	Scott D. Lawrence	11.50	420.00	\$4,830.00
			17.80		\$6,659.50

**Required Notice to Clients.**

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(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

June 22, 2020

Invoice No: 122443  
Our File No: 7066-13 JMR  
Billing through: 05/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

Matter Summary

RE: Employment and Fee Applications

TOTAL FEES	\$23,791.00
TOTAL DISBURSEMENTS	\$6.72
TOTAL CHARGES FOR THIS BILL	<hr/> \$23,797.72
NET BALANCE FORWARD	\$0.00
TOTAL BALANCE NOW DUE	<div>\$23,797.72</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

Wick Phillips Gould & Martin, LLP

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Federal Tax ID: 45-4183914

June 22, 2020

Invoice No: 122443  
Our File No: 7066-13 JMR  
Billing through: 05/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

Employment and Fee Applications

Balance forward as of invoice dated	\$0.00
Payments received since last invoice	\$0.00
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$0.00</u>
Trust balance carried forward	\$0.00

FOR PROFESSIONAL SERVICES RENDERED

04/21/2020	SDL	Research law on "connections" and draft email for circulation to firm to explain "connections" for purpose of Ch 11 Trustee representation conflicts (.8); revise engagement letter to accord with applicable bankruptcy law (3.2); revise list of parties in interest for firm conflict check for Milligan/Zen Garden representation to include relevant attorneys (1.0).	5.00 hrs	420 /hr	N/C
04/23/2020	SDL	Obtain and review various forms of retention application, declaration in support, and proposed orders authorizing retention of counsel for chapter 11 trustee (1.4); research and review applicable Bankruptcy Code, Bankruptcy Rules, and Local Bankruptcy Rules regarding retention application (.5); draft application for G. Milligan to retain and employ Wick Phillips as attorneys (2.5); draft declaration in support of same (1.9); draft proposed order granting same (.8).	7.10 hrs	420 /hr	2,982.00
04/27/2020	SDL	Correspondence with J. Rudd and G. Milligan regarding case management options and set up of same.	0.40 hrs	420 /hr	168.00
04/27/2020	SDL	Revisions to engagement letter to comply with applicable bankruptcy law.	0.90 hrs	420 /hr	N/C
04/28/2020	SDL	Review and analyze O'Toole engagement agreement for potential retention.	0.30 hrs	420 /hr	126.00
04/29/2020	JMR	Analysis of engagement letters for proposed special counsel for TXDOT and PDA matters (0.2).	0.20 hrs	560 /hr	112.00
05/01/2020	JMR	Telephone conference with O'Toole regarding terms of retention and advancing estate employment (0.5);	0.70 hrs	560 /hr	392.00

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Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP		Invoice No:		122443	
For Professional Services Rendered		Invoice through:		05/31/2020	
		correspondence with G. Milligan regarding update and next steps on same (0.2)			
05/01/2020	SDL	Research regarding legal standard for retention of financial advisor and real estate broker.	1.60 hrs	420 /hr	672.00
05/02/2020	SDL	Draft and finalize memo to J. Rudd regarding standard for employing ordinary course professionals (1.2); begin draft of same (.6); draft and finalize memorandum to J. Rudd regarding legal standards for retention of real estate broker and financial advisor (1.5).	3.30 hrs	420 /hr	1,386.00
05/04/2020	SDL	Draft and revise application to retain Harney Advisors as financial advisor (1.9); research comparable cases for inclusion in same (1.8); draft proposed order regarding same (.6); draft declaration in support of same (1.3).	5.60 hrs	420 /hr	2,352.00
05/05/2020	BR	File supplemental statement.	0.10 hrs	165 /hr	16.50
05/05/2020	JMR	Telephone conference with G. Milligan regarding O'Toole retention issues (0.2); revise and comment on Hanrey and WP employment applications (0.5)	0.70 hrs	560 /hr	392.00
05/05/2020	SDL	Revisions to retention application for Harney (.2); revisions to Trustee's verified statement of connections (.3).	0.50 hrs	420 /hr	210.00
05/12/2020	SDL	Revise and send draft Wick Phillips retention application to Trustee for final review.	0.60 hrs	420 /hr	252.00
05/13/2020	BR	Finalize applications to employ; file and serve re same.	2.70 hrs	165 /hr	445.50
05/13/2020	SDL	Finalize Wick Phillips and Harney retention applications, declarations in support, and proposed orders (.7); review and analysis of service requirements for same (.3).	1.00 hrs	420 /hr	420.00
05/14/2020	BR	Prepare Motion Establishing Procedures for Interim Compensation And Reimbursement of Expenses for Professionals.	1.30 hrs	165 /hr	214.50
05/14/2020	SDL	Call with J. Rudd regarding potential retention of real property broker (.1); revisions to non-disclosure agreement to send to potential broker for access to data room (.4).	0.50 hrs	420 /hr	210.00
05/15/2020	JMR	Correspondence and call with T. Irion regarding retention to cover PDA hearing (0.1); correspondence with Trustee on same (0.1)	0.20 hrs	560 /hr	112.00
05/15/2020	SDL	Begin review of prior agreements to ensure no conflict with retention of additional professionals (.2); plan, prepare for and begin work on drafting special counsel, broker and fee procedures motions (.3).	0.50 hrs	420 /hr	210.00
05/17/2020	SDL	Conclude review and correspondence to G. Milligan regarding analysis of retention agreements.	0.20 hrs	420 /hr	84.00
05/18/2020	SDL	Begin draft of motion to retain Sprouse as special counsel (1.0); call with T. Irion regarding same (.2); research into potential for payment of prepetition amounts and correspondence with Trustee, J. Rudd, E. White and T. Irion regarding same (1.1); continue draft of motion (1.4).	3.70 hrs	420 /hr	1,554.00
05/19/2020	BR	Prepare notice of hearing and certificate of service; finalize application to employ special counsel; file and serve re same.	2.90 hrs	165 /hr	478.50



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Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP			Invoice No:		122443
For Professional Services Rendered			Invoice through:		05/31/2020
05/19/2020	DGJ	Pursue strategy re. drafting Retention Application for real estate brokers. (0.4)	0.50 hrs	335 /hr	167.50
05/19/2020	JMR	Review and approve Irion engagement pleadings (0.2); correspondence on broker retention (0.3)	0.50 hrs	560 /hr	280.00
05/19/2020	SDL	Continue revising and finalize draft of retention application for Sprouse (1.5); research applicable law on prepetition amounts due (.5); research law regarding timing of appointment and availability of compensation prior to application date (.9); draft and revise declaration (.6); draft and revise proposed order (.4); call with T. Irion regarding application and declaration and correspondence with Trustee regarding same (.2); finalize all for filing (.7).	4.80 hrs	420 /hr	2,016.00
05/19/2020	SDL	Correspondence with Trustee, proposed broker, and J. Rudd regarding retention application and declaration in support (.4); call and correspondnce with D. Heringer regarding same (.4); call with J. Rudd, G. Milligan and E. White regarding retention terms (.2).	1.00 hrs	420 /hr	420.00
05/20/2020	DGJ	Draft Retention Application for broker (2.5); draft Coddington Decaration in Support of Retention Application for brokers (0.5); draft proposed order granting Retention Application for brokers (0.6)	3.60 hrs	335 /hr	1,206.00
05/20/2020	SDL	Correspondence with D. Heringer regarding broker application (.2); begin review of draft application (.5); correspondence with J. Rudd and S. Tobin regarding Sprouse application (.4); correspondence with T. Irion regarding Sprouse application (.1); correspondence with B. Ramirez regarding objection deadlines for Wick Phillips, Harney and Sprouse applications (.1).	1.30 hrs	420 /hr	546.00
05/21/2020	SDL	Continue review of real estate broker retention application.	1.20 hrs	420 /hr	504.00
05/22/2020	DGJ	Analyze and review initial draft of Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals in anticipation of conferring on same (0.2); confer on strategy re. revising Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals (0.4); analyze, review, revise Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals (1.1); analyze, review, and revise proposed order granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals (0.4)	2.10 hrs	335 /hr	703.50
05/22/2020	DGJ	Pursue strategy re. revising broker declaration (0.3)	0.30 hrs	335 /hr	100.50
05/22/2020	SDL	Conclude initial review of broker retention application and correspondence to J. Rudd regarding same (.4); call to discuss additional revisions with D. Heringer (.2); begin drafting application to retain Foran, O'Toole & Burke LLC (1.9); draft proposed order regarding same (.4); review engagement agreement related thereto (.3).	3.20 hrs	420 /hr	1,344.00

				Page	3
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP For Professional Services Rendered				Invoice No:	122443
				Invoice through:	05/31/2020
05/22/2020	SDL	Call and correspondence with D. Heringer regarding fee procedures application (.3); call with Trustee, E. White and J. Rudd regarding fee procedures and upcoming case deadlines (.4).	0.70 hrs	420 /hr	294.00
05/24/2020	SDL	Revisions to declaration in support of Foran application and correspondence to J. Rudd regarding same.	0.80 hrs	420 /hr	336.00
05/24/2020	SDL	Revisions to motion for fee procedures.	0.20 hrs	420 /hr	84.00
05/25/2020	SDL	Review and revise fee procedures motion.	0.80 hrs	420 /hr	336.00
05/26/2020	DGJ	Draft List of Parties in Interest to be attached as an exhibit to Coddington Declaration (1.1)	1.10 hrs	335 /hr	368.50
05/26/2020	SDL	Continue review and revisions to fee procedures motion.	0.80 hrs	420 /hr	336.00
05/27/2020	SDL	Revisions to fee procedures motion (1.1); correspondence with Trustee, E. White and J. Rudd regarding press coverage of case (.1).	1.20 hrs	420 /hr	504.00
05/27/2020	SDL	Review fee procedures and call and correspondence with T. Irion regarding reimbursement procedures going forward and status of request for payment of prepetition amounts (.8); revisions to declaration in support of broker retention (.4).	1.20 hrs	420 /hr	504.00
05/28/2020	SDL	Call with J. Rudd to discuss revisions to compensation procedures motion (.2); implement revisions, finalize draft and circulate to Trustee for approval (.6).	0.80 hrs	420 /hr	336.00
05/29/2020	JMR	Correspondence and telephone conference with T. Scannell regarding negotiations of broker and O. Toole retention terms (0.4); correspondence and call with M. O'Toole on same (0.4); correspondence and call to broker on same (0.3)	1.10 hrs	560 /hr	616.00
Total fees for this matter			67.20 hrs		23,791.00

#### DISBURSEMENTS

05/31/2020	Thomson Reuters-West - Online Research	6.72
Total disbursements for this matter		\$6.72

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 4 Invoice No: 122443 Invoice through: 05/31/2020
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**BILLING SUMMARY**

TOTAL FEES	\$23,791.00
TOTAL DISBURSEMENTS	\$6.72
 TOTAL CHARGES FOR THIS BILL	 \$23,797.72
NET BALANCE FORWARD	\$0.00
TOTAL BALANCE NOW DUE	\$23,797.72

**Timekeeper Summary**

Name			Hours	Rate	Amount
Legal Assistant	BR	Brenda Ramirez	7.00	165.00	\$1,155.00
Associate	DGJ	Daniella G. Heringer	7.60	335.00	\$2,546.00
Partner	JMR	Jason M Rudd	3.40	560.00	\$1,904.00
Associate	SDL	Scott D. Lawrence	5.90	0.00	\$0.00
Associate	SDL	Scott D. Lawrence	43.30	420.00	\$18,186.00
			67.20		\$23,791.00

**Required Notice to Clients.**

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Federal Tax No: 45-4183914

June 22, 2020

Invoice No: 122444  
Our File No: 7066-10 JMR  
Billing through: 05/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Claims Administration and Objections

TOTAL FEES	\$630.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$630.00
NET BALANCE FORWARD	\$0.00
TOTAL BALANCE NOW DUE	<div>\$630.00</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP  
Please include invoice number on payment. Thank you!

**Wick Phillips Gould & Martin, LLP**

3131 McKinney Avenue  
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(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

June 22, 2020

Invoice No: 122444  
Our File No: 7066-10 JMR  
Billing through: 05/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Claims Administration and Objections**

Balance forward as of invoice dated	\$0.00
Payments received since last invoice	\$0.00
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$0.00</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

04/26/2020	JMR	Correspondence with A. Woodham regarding Panache agreements, loans and related information (0.1); initial review of same (0.2); analysis of new files shared on Box share file and new Panache correspondence (0.6)	0.90 hrs	560 /hr	504.00
05/20/2020	SDL	Review correspondence from counsel for receiver regarding custodian claims.	0.30 hrs	420 /hr	126.00
Total fees for this matter			<u>1.20 hrs</u>		<u>630.00</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP For Professional Services Rendered	Page 1 Invoice No: 122444 Invoice through: 05/31/2020
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**BILLING SUMMARY**

TOTAL FEES	\$630.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	\$630.00
NET BALANCE FORWARD	\$0.00
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$630.00</div>

**Timekeeper Summary**

Name		Hours	Rate	Amount
Partner	JMR Jason M Rudd	0.90	560.00	\$504.00
Associate	SDL Scott D. Lawrence	0.30	420.00	\$126.00
		1.20		\$630.00

**Required Notice to Clients.**

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Federal Tax No: 45-4183914

June 22, 2020

Invoice No: 122445  
Our File No: 7066-09 JMR  
Billing through: 05/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Case Administration

TOTAL FEES	\$2,688.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$2,688.00
NET BALANCE FORWARD	\$0.00
TOTAL BALANCE NOW DUE	<div>\$2,688.00</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

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Federal Tax ID: 45-4183914

June 22, 2020

Invoice No: 122445  
Our File No: 7066-09 JMR  
Billing through: 05/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

Case Administration

Balance forward as of invoice dated	\$0.00
Payments received since last invoice	\$0.00
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$0.00</u>
Trust balance carried forward	\$0.00

FOR PROFESSIONAL SERVICES RENDERED

04/28/2020	SDL	Correspondence regarding set up of shared document space, document indexing and related matters with B. Ramirez (.6); update case tracking spreadsheet with case deadlines, including research to ensure deadlines are calculated correctly given involuntary filing and trustee appointment (1.1).	1.70 hrs	420 /hr	714.00
04/29/2020	SDL	Multiple correspondences with Trustee and B. Ramirez and initial inquiry into potential new lawsuit by D. White against Romspen (.9); continue working on calculating case deadlines, including tax filing deadlines, and preparing correspondence related to same (.8).	1.70 hrs	420 /hr	714.00
05/01/2020	SDL	Finalize and distribute case deadline reminders to team.(1.3); call and discussion with Panache personnel regarding preparation of schedules (.5).	1.80 hrs	420 /hr	756.00
05/13/2020	SDL	Review additional potential deadlines related to 341 meeting and correspondence and call with Trustee regarding same.	0.30 hrs	420 /hr	126.00
05/26/2020	SDL	Correspondence to B. Ramirez regarding service list updates.	0.10 hrs	420 /hr	42.00
05/29/2020	SDL	Finalize interim professional compensation procedures motion for filing and correspondence with B. Ramirez regarding same (.6); correspondence with T. Irion regarding same (.2).	0.80 hrs	420 /hr	336.00
Total fees for this matter			<u>6.40 hrs</u>		<u>2,688.00</u>



Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP For Professional Services Rendered	Page 1 Invoice No: 122445 Invoice through: 05/31/2020
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BILLING SUMMARY

TOTAL FEES	\$2,688.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	\$2,688.00
NET BALANCE FORWARD	\$0.00
TOTAL BALANCE NOW DUE	\$2,688.00

Timekeeper Summary

Name	Hours	Rate	Amount
Associate      SDL      Scott D. Lawrence	6.40	420.00	\$2,688.00
	6.40		\$2,688.00

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Federal Tax No: 45-4183914

June 22, 2020

Invoice No: 122446  
Our File No: 7066-08 JMR  
Billing through: 05/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Business Operations

TOTAL FEES	\$5,026.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$5,026.00
NET BALANCE FORWARD	\$0.00
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$5,026.00</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

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Federal Tax ID: 45-4183914

June 22, 2020

Invoice No: 122446  
Our File No: 7066-08 JMR  
Billing through: 05/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Business Operations**

Balance forward as of invoice dated	\$0.00
Payments received since last invoice	\$0.00
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$0.00</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

04/28/2020	SDL	Multiple correspondences from Panache, Trustee and others regarding development of short-term budget and emergency expenditures, along with analysis of legal restrictions on spending related to same	0.60 hrs	420 /hr	252.00
04/29/2020	SDL	Prepare for and attend call with Trustee, Harney, Panache, and K. Mercer regarding developing budget and emergency needs (.8); review and comment on proposed budget, including U.S. Trustee fees and insurance issues (.6).	1.40 hrs	420 /hr	588.00
04/30/2020	JMR	Telephone conference with A. Zarafshani regarding planning for needed property preservation activities and authority for same (0.3); correspondence on same (0.2)	0.50 hrs	560 /hr	280.00
04/30/2020	SDL	Review budget and attend call with Trustee and Financial Advisor regarding same (.5); review revisions to budget incorporating comments from Panache and Financial Advisor (.7); research applicable law on utilities providers and payment options related thereto (1.0); correspondence to Trustee and Financial advisor regarding same and additional comments to budget (.6); call to discuss finalizing budget (1.1).	3.90 hrs	420 /hr	1,638.00
05/27/2020	SDL	Correspondence regarding budget items and need for authority to pay prepetition amounts.	0.20 hrs	420 /hr	84.00
05/28/2020	JMR	Telephone conferences (2) with G. Milligan regarding operation developments and updates and resolution of same (0.3)	0.30 hrs	560 /hr	168.00
05/28/2020	SDL	Call with Trustee, E. White and J. Rudd regarding	4.50 hrs	420 /hr	1,890.00

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP For Professional Services Rendered	Page Invoice No: Invoice through:	1 122446 05/31/2020
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	need for critical vendor motion (.2); research potential forms of critical vendor motion appropriate to case and needs (.7); adapt form and draft critical vendor motion (2.7); draft proposed order granting same (.5); correspondence with E. White to obtain and analyze budget for prepetition amounts proposed to be paid under critical vendor motion (.4);			
05/30/2020	SDL	Review press coverage of PDA proceeding and correspondence regarding preparation of tax returns.	0.30 hrs	420 /hr
				126.00
Total fees for this matter			11.70 hrs	5,026.00

BILLING SUMMARY

TOTAL FEES	\$5,026.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	\$5,026.00
NET BALANCE FORWARD	\$0.00
TOTAL BALANCE NOW DUE	\$5,026.00

Timekeeper Summary

Name		Hours	Rate	Amount
Partner	JMR Jason M Rudd	0.80	560.00	\$448.00
Associate	SDL Scott D. Lawrence	10.90	420.00	\$4,578.00
		11.70		\$5,026.00

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Federal Tax No: 45-4183914

June 22, 2020

Invoice No: 122447  
Our File No: 7066-07 JMR  
Billing through: 05/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Budgeting (Case)

TOTAL FEES	\$84.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$84.00
NET BALANCE FORWARD	\$0.00
TOTAL BALANCE NOW DUE	<div>\$84.00</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

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Federal Tax ID: 45-4183914

June 22, 2020

Invoice No: 122447  
Our File No: 7066-07 JMR  
Billing through: 05/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

Budgeting (Case)

Balance forward as of invoice dated	\$0.00
Payments received since last invoice	\$0.00
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$0.00</u>
Trust balance carried forward	\$0.00

FOR PROFESSIONAL SERVICES RENDERED

05/26/2020	SDL	Correspondence with E. White regarding budget reconciliation report.	0.20 hrs	420 /hr	84.00
Total fees for this matter			<u>0.20 hrs</u>		<u>84.00</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 1 Invoice No: 122447 Invoice through: 05/31/2020
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**BILLING SUMMARY**

TOTAL FEES	\$84.00
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$84.00
NET BALANCE FORWARD	\$0.00
TOTAL BALANCE NOW DUE	\$84.00

**Timekeeper Summary**

Name		Hours	Rate	Amount	
Associate	SDL	Scott D. Lawrence	0.20	420.00	\$84.00
			0.20		\$84.00

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June 22, 2020

Invoice No: 122448  
Our File No: 7066-04 JMR  
Billing through: 05/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Asset Disposition

TOTAL FEES	\$3,370.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$3,370.00
NET BALANCE FORWARD	\$0.00
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$3,370.00</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

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June 22, 2020

Invoice No: 122448  
Our File No: 7066-04 JMR  
Billing through: 05/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Asset Disposition**

Balance forward as of invoice dated	\$0.00
Payments received since last invoice	\$0.00
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$0.00</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

04/28/2020	SDL	Prepare for and participate in call with J. Tillotson, counsel for D. White, regarding potential disposition of the property and go-forward ownership structures.	0.40 hrs	420 /hr	168.00
05/13/2020	JMR	Review and comment on draft NDA for dataroom (0.2); correspondence on approval of dataroom sharing and related issues (0.2)	0.40 hrs	560 /hr	224.00
05/14/2020	JMR	Strategy and proposal conference with potential brokers regarding proposed services and marketing plan for project to advance sale process (1.0); follow up call with G. Milligan regarding same (0.2)	1.20 hrs	560 /hr	672.00
05/16/2020	BR	Document production for data room.	3.20 hrs	165 /hr	528.00
05/16/2020	SDL	Multiple correspondences and review of documents to provide to property broker to commence marketing process.	0.80 hrs	420 /hr	336.00
05/18/2020	SDL	Conference call with potential broker regarding proposed retention (.7); follow up call with Trustee regarding same (.2).	0.90 hrs	420 /hr	378.00
05/19/2020	JMR	Portion of conference call with T. Scannell regarding process and brokers to sell development and terms of same (0.3); telephone conference with G. Milligan on same (0.3); correspondence with brokers and T. Scannell on same (0.2)	0.80 hrs	560 /hr	448.00
05/22/2020	JMR	Telephone conference with T. Scannell regarding advancing retention of sales process (0.2); correspondence with potential brokers on same (0.1); correspondence with G. Milligan on same (0.1)	0.40 hrs	560 /hr	224.00

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP For Professional Services Rendered				Page	1
				Invoice No:	122448
				Invoice through:	05/31/2020
05/26/2020	JMR	Correspondence with T. Scannell, Trustee and brokers regarding negotiation of terms with for potential employment as brokers (0.3).	0.30 hrs	560 /hr	168.00
05/27/2020	JMR	Correspondence with Romspen counsel regarding status of approval of broker retention terms (0.2)	0.20 hrs	560 /hr	112.00
05/28/2020	JMR	Correspondence on broker retention with Romspen counsel and Trustee (0.2)	0.20 hrs	560 /hr	112.00
Total fees for this matter			8.80 hrs		3,370.00

**BILLING SUMMARY**

TOTAL FEES	\$3,370.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	\$3,370.00
NET BALANCE FORWARD	\$0.00
TOTAL BALANCE NOW DUE	\$3,370.00

**Timekeeper Summary**

Name			Hours	Rate	Amount
Legal Assistant	BR	Brenda Ramirez	3.20	165.00	\$528.00
Partner	JMR	Jason M Rudd	3.50	560.00	\$1,960.00
Associate	SDL	Scott D. Lawrence	2.10	420.00	\$882.00
			8.80		\$3,370.00

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Federal Tax No: 45-4183914

June 22, 2020

Invoice No: 122449  
Our File No: 7066-03 JMR  
Billing through: 05/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Asset Analysis and Recovery

TOTAL FEES	\$13,166.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$13,166.00
NET BALANCE FORWARD	\$0.00
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$13,166.00</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

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Federal Tax ID: 45-4183914

June 22, 2020

Invoice No: 122449  
Our File No: 7066-03 JMR  
Billing through: 05/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

Asset Analysis and Recovery

Balance forward as of invoice dated	\$0.00
Payments received since last invoice	\$0.00
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$0.00</u>
Trust balance carried forward	\$0.00

FOR PROFESSIONAL SERVICES RENDERED

04/22/2020	JMR	Correspondence with G. Milligan regarding immediate items in view of appointment order (0.4); strategy conference with G. Milligan (Trustee) and S. Lawrence on immediate issues to transition estate, secure assets and gather background information (0.5); telephone conference with debtor's counsel and petitioning creditors' counsel to initiate transition of estate, urgent items and next steps (0.8); analysis of background, related litigation and other documents to advance transition and next steps in case (0.9)	2.60 hrs	560 /hr	1,456.00
04/23/2020	JMR	Telephone conference with debtor's insurance broker regarding current coverage, unpaid premiums, refund potential and any pending claims (0.4); correspondence on same (0.2)	0.60 hrs	560 /hr	336.00
04/24/2020	JMR	Telephone conference with R. Roy (Receiver) and S. Whitehead (Counsel) regarding background and transition of pending estate matters with focus on urgent items and options to advance recoveries and find value for creditors (1.1); telephone conference with Cushman Wakefield team regarding status of marketing for property, valuation issues and next potential steps to lease or sell property and related issues (0.6); transition conference with A. Zarafshani, R. Horton, G. Milligan and K. Mercer regarding status of project, state of assets and funding, options for value and related transitions issues (3.1)	4.80 hrs	560 /hr	2,688.00
04/27/2020	SDL	Begin review of documents provided by debtor	1.30 hrs	420 /hr	546.00

		Page		1	
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP		Invoice No:		122449	
For Professional Services Rendered		Invoice through:		05/31/2020	
	regarding status of project, disputes with vendors, lenders, regulators and other parties, and developing strategy for resolving same to monetize asset.				
04/29/2020	BR	Prepare document log.	0.80 hrs	165 /hr	132.00
04/30/2020	JMR	Telephone conference with S. Ayers (CTRMA counsel) regarding status of settlement, next steps to preserve and advance same (0.5); strategy call with G. Milligan on follow up to advance same (0.2)	0.70 hrs	560 /hr	392.00
05/01/2020	CCK	Telephone conference with J. Rudd to discuss insurance policy review project (.2); review pictures of mold damage at client premises (.2); review client insurance program summary chart (.2); review designated premises endorsements to CGL and umbrella liability policies (.4); review property policy binder (.3 ); review builder's risk policy (1.5 ); review endorsement to builder's risk policy rescinding notice of cancellation (.1); review property moisture report (.2 ); draft summary analyzing potential mold coverage available under the builder's risk policy (1.2 ); review client e-mails regarding same (.2 ); draft summary of coverage limitation afforded by liability policy forms (.5 ); analyze potential gaps in insurance program (.2).	5.20 hrs	560 /hr	2,912.00
05/01/2020	JMR	Conference call with C. Keeble regarding analysis of estate's insurance policies to assess coverage and identify potential claims (0.3); correspondence on same with A. Zarafshai and C. Keeble (0.2)	0.50 hrs	560 /hr	280.00
05/04/2020	CCK	Draft and revise lengthy e-mail to J. Rudd regarding potential mold coverage afforded by Builder's Risk and property policies (1.1) ; analyze potential coverage gaps in Zen Garden insurance program and draft summary regarding same (.8 ); draft summary of coverage afforded by CNA Builder's risk policy (1.6 ).	3.50 hrs	560 /hr	1,960.00
05/09/2020	JMR	Correspondence with Hinshaw firm and Trustee regarding potential litigation claim assets (0.2)	0.20 hrs	560 /hr	112.00
05/12/2020	JMR	Conference call with Hinshaw & Culbertson LLP legal team and former counsel to Debtors regarding all potential litigation claims, recoveries, transition issues and related recovery matters (0.6); post call with Trustee on next steps (0.1)	0.70 hrs	560 /hr	392.00
05/28/2020	JMR	Telephone conference with G. Milligan regarding general contractor insurance request and response to same (0.1); correspondence with C. Keeble on same (0.2)	0.30 hrs	560 /hr	168.00
05/29/2020	CCK	Review and respond to e-mail from J. Rudd regarding review of general contractor's insurance policies (.2); review workers compensation and employer's liability policy (.7); review business auto liability (.8); draft e-mail to J. Rudd regarding benefit to debtor from workers compensation and auto liability policies (.7); begin review of coverage afforded by package policy (.8).	3.20 hrs	560 /hr	1,792.00
Total fees for this matter			24.40 hrs		13,166.00

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP For Professional Services Rendered	Page 2 Invoice No: 122449 Invoice through: 05/31/2020
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**BILLING SUMMARY**

TOTAL FEES	\$13,166.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	\$13,166.00
NET BALANCE FORWARD	\$0.00
TOTAL BALANCE NOW DUE	\$13,166.00

**Timekeeper Summary**

Name			Hours	Rate	Amount
Legal Assistant	BR	Brenda Ramirez	0.80	165.00	\$132.00
Partner	CCK	Charles C. Keeble	11.90	560.00	\$6,664.00
Partner	JMR	Jason M Rudd	10.40	560.00	\$5,824.00
Associate	SDL	Scott D. Lawrence	1.30	420.00	\$546.00
			24.40		\$13,166.00

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Federal Tax No: 45-4183914

June 22, 2020

Invoice No: 122450  
Our File No: 7066-11 JMR  
Billing through: 05/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Corporate Governance and Board Matters

TOTAL FEES	\$504.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$504.00
NET BALANCE FORWARD	\$0.00
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$504.00</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

**Wick Phillips Gould & Martin, LLP**

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Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

June 22, 2020

Invoice No: 122450  
Our File No: 7066-11 JMR  
Billing through: 05/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Corporate Governance and Board Matters**

Balance forward as of invoice dated	\$0.00
Payments received since last invoice	\$0.00
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$0.00</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

04/30/2020	JMR	Telephone conference with D. White (primary Debtor equity holder) counsel (J. Tilliotson and D. Williamson) and G. Milligan regarding ownership of debtor, pending disputes and litigation and options to fund and advance case (0.7); post discussion follow up with G. Milligan (0.2).	0.90 hrs	560 /hr	504.00
Total fees for this matter			<u>0.90 hrs</u>		<u>504.00</u>



Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 1 Invoice No: 122450 Invoice through: 05/31/2020
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**BILLING SUMMARY**

TOTAL FEES	\$504.00
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$504.00
NET BALANCE FORWARD	\$0.00
TOTAL BALANCE NOW DUE	\$504.00

**Timekeeper Summary**

Name	Hours	Rate	Amount
Partner JMR Jason M Rudd	0.90	560.00	\$504.00
	0.90		\$504.00

**Required Notice to Clients.**

THE STATE BAR OF TEXAS INVESTIGATES AND PROSECUTES PROFESSIONAL MISCONDUCT COMMITTED BY TEXAS ATTORNEYS. ALTHOUGH NOT EVERY COMPLAINT AGAINST OR DISPUTE WITH A LAWYER INVOLVES PROFESSIONAL MISCONDUCT, THE STATE BAR'S OFFICE OR GENERAL COUNSEL WILL PROVIDE YOU WITH INFORMATION ABOUT HOW TO FILE A COMPLAINT. PLEASE CALL 1-800-932-1900 TOLL-FREE FOR MORE INFORMATION.

## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200 phone  
(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

June 22, 2020

Invoice No: 122451  
Our File No: 7066-25 JMR  
Billing through: 05/31/2020

Greg Milligan  
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden, LP  
Email to: gmilligan@harneypartners.com

### Matter Summary

RE: Challenge Investigation

TOTAL FEES	\$3,021.50
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$3,021.50
NET BALANCE FORWARD	\$0.00
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$3,021.50</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
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Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

June 22, 2020

Invoice No: 122451  
Our File No: 7066-25 JMR  
Billing through: 05/31/2020

Greg Milligan  
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden, LP  
Email to: gmilligan@harneypartners.com

### Challenge Investigation

Balance forward as of invoice dated	\$0.00
Payments received since last invoice	\$0.00
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$0.00</u>
Trust balance carried forward	\$0.00

### FOR PROFESSIONAL SERVICES RENDERED

05/21/2020	NBN	Correspond with J. Rudd and client.	0.30 hrs	495 /hr	148.50
05/22/2020	DGJ	Participate in phone conference re. investigation of lenders' liens and claims against them (0.5)	0.50 hrs	335 /hr	167.50
05/22/2020	JMR	Strategy conference with N. Nelson and M. Bailey regarding investigation of Romspen liens and related claims (0.4); correspondence to advance preparations for same with litigation and lien review teams (0.2)	0.60 hrs	560 /hr	336.00
05/22/2020	MWB	Telephone conference regarding strategy.	0.50 hrs	545 /hr	272.50
05/22/2020	NBN	Review materials provided by client (.6); attend call with J. Rudd and M. Bailey regarding scope of investigation and background (.5).	1.10 hrs	495 /hr	544.50
05/22/2020	SDL	Prepare for and participate in kick off call with challenge team (.5); follow up correspondence with team and B. Ramirez (.4).	0.90 hrs	420 /hr	378.00
05/26/2020	SDL	Correspondence related to obtaining lien search for challenge investigation.	0.50 hrs	420 /hr	210.00
05/27/2020	SDL	Additional correspondence with Trustee and Chicago Title regarding credit and payment and commencement of lien search.	0.60 hrs	420 /hr	252.00
05/28/2020	NBN	Prepare proposed time of investigation (.6); review related documents (.3); correspond with J. Rudd regarding same (.2).	1.10 hrs	495 /hr	544.50
05/29/2020	SDL	Review correspondence and proposed timeline for investigation (.2); correspondence with Chicago Title regarding lien search (.2).	0.40 hrs	420 /hr	168.00
Total fees for this matter			<u>6.50 hrs</u>		<u>3,021.50</u>

Greg Milligan as proposed ch 11 trustee of  
3443 Zen Garden LP  
For Professional Services Rendered

Page 1  
Invoice No: 122451  
Invoice through: 05/31/2020

BILLING SUMMARY

TOTAL FEES	\$3,021.50
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	\$3,021.50
NET BALANCE FORWARD	\$0.00
TOTAL BALANCE NOW DUE	\$3,021.50

Timekeeper Summary

Name			Hours	Rate	Amount
Associate	DGJ	Daniella G. Heringer	0.50	335.00	\$167.50
Partner	JMR	Jason M Rudd	0.60	560.00	\$336.00
Partner	MWB	Michael W Bailey	0.50	545.00	\$272.50
Partner	NBN	Nick B. Nelson	2.50	495.00	\$1,237.50
Associate	SDL	Scott D. Lawrence	2.40	420.00	\$1,008.00
			6.50		\$3,021.50

Required Notice to Clients.

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## Wick Phillips Gould & Martin, LLP

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(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

July 6, 2020

Invoice No: 123566  
Our File No: 7066-16 JMR  
Billing through: 06/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Litigation: Contested Matters and Adversary  
Proceedings

TOTAL FEES	\$504.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$504.00
NET BALANCE FORWARD	\$168.00
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$672.00</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax No. 45-4183914

July 6, 2020

Invoice No. 123566  
Reference No. 7066-16 JMR

Greg Milligan  
Attn: Gregory S. Milligan

Litigation: Contested Matters and Adversary Proceedings

Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122440	06/22/2020	16	JMR	\$168.00	\$168.00
Total Outstanding Balance					\$168.00
Total Amount Due on this Invoice					\$504.00
Total Balance Now Due					<u>\$672.00</u>

Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$168.00	\$0.00	\$0.00	\$0.00	\$0.00	\$168.00

Please remit payment within 30 days. Thank you!

**Wick Phillips Gould & Martin, LLP**

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

July 6, 2020

Invoice No: 123566  
Our File No: 7066-16 JMR  
Billing through: 06/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Litigation: Contested Matters and Adversary Proceedings**

Balance forward as of invoice dated 06/22/2020	\$168.00
Payments received since last invoice	\$0.00
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$168.00</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

06/21/2020	JMR	Analysis and comment on K. Mercer draft motion regarding removables lien priority litigation procedures and schedule (0.4); correspondence with Trustee team on same (0.1)	0.50 hrs	560 /hr	280.00
06/22/2020	JMR	Analysis of revised motion on removables lien priory dispute procedures and authorize filing of same (0.4)	0.40 hrs	560 /hr	224.00
Total fees for this matter			<u>0.90 hrs</u>		<u>504.00</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 1 Invoice No: 123566 Invoice through: 06/30/2020
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**BILLING SUMMARY**

TOTAL FEES	\$504.00
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$504.00
NET BALANCE FORWARD	\$168.00
TOTAL BALANCE NOW DUE	\$672.00

**Timekeeper Summary**

Name	Hours	Rate	Amount
Partner JMR Jason M Rudd	0.90	560.00	\$504.00
	0.90		\$504.00

**Required Notice to Clients.**

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Federal Tax No: 45-4183914

July 6, 2020

Invoice No: 123567  
Our File No: 7066-01 JMR  
Billing through: 06/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: 3443 Zen Gardens Bankruptcy

TOTAL FEES	\$0.00
TOTAL DISBURSEMENTS	\$1,595.52
TOTAL CHARGES FOR THIS BILL	<hr/> \$1,595.52
NET BALANCE FORWARD	\$972.96
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$2,568.48</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP  
Please include invoice number on payment. Thank you!

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(214) 692-6255  
Federal Tax No. 45-4183914

July 6, 2020

Invoice No. 123567  
Reference No. 7066-01 JMR

Greg Milligan  
Attn: Gregory S. Milligan

3443 Zen Gardens Bankruptcy

### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122435	06/22/2020	01	JMR	\$972.96	\$972.96
Total Outstanding Balance					\$972.96
Total Amount Due on this Invoice					\$1,595.52
Total Balance Now Due					<u>\$2,568.48</u>

### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$972.96	\$0.00	\$0.00	\$0.00	\$0.00	\$972.96

Please remit payment within 30 days. Thank you!

Wick Phillips Gould & Martin, LLP

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(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

July 6, 2020

Invoice No: 123567  
Our File No: 7066-01 JMR  
Billing through: 06/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

3443 Zen Gardens Bankruptcy

Balance forward as of invoice dated 06/22/2020	\$972.96
Payments received since last invoice	\$0.00
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$972.96</u>
Trust balance carried forward	\$0.00

DISBURSEMENTS

06/01/2020	Copies for bankruptcy on 05/31/20	24.80
06/11/2020	Bankruptcy copies (BR)	124.00
06/11/2020	Bankruptcy copies (BR)	12.20
06/15/2020	Classic Legal Document Services, Inc. - Heavy Litigation, copies, tabs & binders	968.62
06/25/2020	Bankruptcy copies (BR)	102.60
06/30/2020	Delivery services/messengers	242.30
06/30/2020	Postage	121.00
	Total disbursements for this matter	<u>\$1,595.52</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP For Professional Services Rendered	Page 1 Invoice No: 123567 Invoice through: 06/30/2020
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BILLING SUMMARY

TOTAL FEES	\$0.00
TOTAL DISBURSEMENTS	\$1,595.52
TOTAL CHARGES FOR THIS BILL	\$1,595.52
NET BALANCE FORWARD	\$972.96
TOTAL BALANCE NOW DUE	\$2,568.48

Required Notice to Clients.

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Federal Tax No: 45-4183914

July 6, 2020

Invoice No: 123568  
Our File No: 7066-21 JMR  
Billing through: 06/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Relief from Stay and Adequate Protection

TOTAL FEES	\$336.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$336.00
NET BALANCE FORWARD	\$0.00
TOTAL BALANCE NOW DUE	<div>\$336.00</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP  
Please include invoice number on payment. Thank you!

Wick Phillips Gould & Martin, LLP

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(214) 692-6255  
Federal Tax ID: 45-4183914

July 6, 2020

Invoice No: 123568  
Our File No: 7066-21 JMR  
Billing through: 06/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

Relief from Stay and Adequate Protection

Balance forward as of invoice dated	\$0.00
Payments received since last invoice	\$0.00
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$0.00</u>
Trust balance carried forward	\$0.00

FOR PROFESSIONAL SERVICES RENDERED

06/04/2020	JMR	Telephone conference with R. Horton regarding defense of suits against GC and related stay issues (0.3)	0.30 hrs	560 /hr	168.00
06/09/2020	JMR	Telephone conference with R. Horton regarding potential stay of litigation (0.2); correspondence with Trustee team on same (0.1)	0.30 hrs	560 /hr	168.00
Total fees for this matter			<u>0.60 hrs</u>		<u>336.00</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 1 Invoice No: 123568 Invoice through: 06/30/2020
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BILLING SUMMARY

TOTAL FEES	\$336.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	\$336.00
NET BALANCE FORWARD	\$0.00
TOTAL BALANCE NOW DUE	\$336.00

Timekeeper Summary

Name	Hours	Rate	Amount
Partner JMR Jason M Rudd	0.60	560.00	\$336.00
	0.60		\$336.00

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Federal Tax No: 45-4183914

July 6, 2020

Invoice No: 123569  
Our File No: 7066-25 JMR  
Billing through: 06/30/2020

Greg Milligan  
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden, LP  
Email to: gmilligan@harneypartners.com

### Matter Summary

RE: Challenge Investigation

TOTAL FEES	\$17,393.50
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$17,393.50
NET BALANCE FORWARD	\$3,021.50
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$20,415.00</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP  
Please include invoice number on payment. Thank you!



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Federal Tax No. 45-4183914

July 6, 2020

Invoice No. 123569  
Reference No. 7066-25 JMR

Greg Milligan  
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden, LP  
Email to: gmilligan@harneypartners.com

### Challenge Investigation

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122451	06/22/2020	25	JMR	\$3,021.50	\$3,021.50
Total Outstanding Balance					\$3,021.50
Total Amount Due on this Invoice					\$17,393.50
Total Balance Now Due					<u>\$20,415.00</u>

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$3,021.50	\$0.00	\$0.00	\$0.00	\$0.00	\$3,021.50

Please remit payment within 30 days. Thank you!

# Wick Phillips Gould & Martin, LLP

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Federal Tax ID: 45-4183914

July 6, 2020

Invoice No: 123569  
Our File No: 7066-25 JMR  
Billing through: 06/30/2020

Greg Milligan  
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden, LP  
Email to: gmilligan@harneypartners.com

## Challenge Investigation

Balance forward as of invoice dated 06/22/2020	\$3,021.50
Payments received since last invoice	\$0.00
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$3,021.50</u>
Trust balance carried forward	\$0.00

## FOR PROFESSIONAL SERVICES RENDERED

06/01/2020	BR	Document production.	0.50 hrs	165 /hr	82.50
06/01/2020	SDL	Correspondence with B. Ramirez regarding saving of lien report documents.	0.10 hrs	420 /hr	42.00
06/03/2020	MWB	Review title work.	1.80 hrs	545 /hr	981.00
06/08/2020	NBN	Review pleadings to evaluate claims.	1.50 hrs	495 /hr	742.50
06/09/2020	NBN	Revise timeline for tasks related to investigation; correspond and teleconference with J. Rudd regarding same.	0.80 hrs	495 /hr	396.00
06/10/2020	NBN	Prepare for call related to Zen Garden investigation; review documents received from Zen Garden.	0.60 hrs	495 /hr	297.00
06/10/2020	SDL	Call with Trustee, J. Rudd and E. White regarding challenge process and next steps.	0.20 hrs	420 /hr	84.00
06/11/2020	NBN	Attend call with client; conduct initial call with Adam Zarafshani.	1.10 hrs	495 /hr	544.50
06/11/2020	SDL	Call with N. Nelson, Trustee, E. White and J. Rudd to discuss challenge investigation and next steps regarding same (.3); correspondence with E. White and Trustee regarding protective advances (.2);	0.50 hrs	420 /hr	N/C
06/12/2020	NBN	Correspond with Zen Garden regarding Dan Richardson role; correspond with J. Rudd regarding next steps for scheduling D. Richardson interview.	0.60 hrs	495 /hr	297.00
06/15/2020	NBN	Correspond with Romspen counsel to coordinate interview with D. Richardson; attend all with T. Scannell regarding same.	0.70 hrs	495 /hr	346.50
06/16/2020	NBN	Prepare for and attend call with counsel for Romspen.	0.80 hrs	495 /hr	396.00
06/17/2020	NBN	Attend phone call with representative of Zen	0.50 hrs	495 /hr	247.50

			Page		1
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden d.P.			Invoice No:		123569
For Professional Services Rendered			Invoice through:		06/30/2020
	Garden.				
06/20/2020	JMR	Correspondence with Hinshaw legal team and N. Nelson regarding suit against Rompsen and advancing investigation of same (0.2)	0.20 hrs	560 /hr	112.00
06/22/2020	MWB	Review title insurance policy; correspondence regarding the same; review loan documents; correspondence regarding the same.	7.40 hrs	545 /hr	4,033.00
06/22/2020	NBN	Correspond with M. Bailey regarding status of lien and loan document analysis; review pleadings.	0.40 hrs	495 /hr	198.00
06/23/2020	MWB	Review lien searches; review loan documents.	2.50 hrs	545 /hr	1,362.50
06/23/2020	NBN	Correspond with counsel for Rompsen; review documents provided by Zen Garden.	0.60 hrs	495 /hr	297.00
06/23/2020	SDL	Call with N. Nelson, J. Rudd & Trustee regarding challenge process (.3); review and correspond with Trustee and J. Rudd regarding state court lawsuit against Rompsen (.5).	0.80 hrs	420 /hr	336.00
06/24/2020	JMR	Correspondence on D. Richardson interview (0.2)	0.20 hrs	560 /hr	112.00
06/24/2020	NBN	Review documents produced by Panache; attend call with A. Zarafshani regarding same; correspond with opposing counsel; attend call with Dan Richardson.	1.20 hrs	495 /hr	594.00
06/25/2020	JMR	Correspondence on D. Richardson interview and related issues (0.2); correspondence on document requests (0.1)	0.30 hrs	560 /hr	168.00
06/25/2020	NBN	Prepare for Dan Richardson interview; attend call with A. Zarifshani regarding production of documents.	2.50 hrs	495 /hr	1,237.50
06/26/2020	NBN	Correspond with D. Richardson regarding interview and logistics for same; correspond with J. Rudd regarding same; prepare written demand to A. Zarafshani regarding documents needed.	1.10 hrs	495 /hr	544.50
06/28/2020	JMR	Correspondence with R. Horton regarding information requests related to D. Richardson (0.2)	0.20 hrs	560 /hr	112.00
06/29/2020	NBN	Correspond with prior counsel for Zen Garden regarding the conditions for their participation in the investigation; correspond with Zen Garden.	0.70 hrs	495 /hr	346.50
06/30/2020	JMR	Strategy discussion and correspondence with G. Milligan on advancement of claim investigation (0.5); analysis of issues on same with N. Nelson (0.4); correspondence with former counsel on same (0.2); correspondence on document collection (0.3)	1.40 hrs	560 /hr	784.00
06/30/2020	NBN	Prepare for and attend interview of Dan Richardson; review documents provided by client; strategy call with J. Rudd.	5.20 hrs	495 /hr	2,574.00
06/30/2020	SDL	Call and correspondence with Trustee regarding causes of action and counsel related to challenge period.	0.30 hrs	420 /hr	126.00
Total fees for this matter			34.70 hrs		17,393.50

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 2 Invoice No: 123569 Invoice through: 06/30/2020
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**BILLING SUMMARY**

TOTAL FEES	\$17,393.50
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$17,393.50
NET BALANCE FORWARD	\$3,021.50
TOTAL BALANCE NOW DUE	\$20,415.00

**Timekeeper Summary**

Name			Hours	Rate	Amount
Legal Assistant	BR	Brenda Ramirez	0.50	165.00	\$82.50
Partner	JMR	Jason M Rudd	2.30	560.00	\$1,288.00
Partner	MWB	Michael W Bailey	11.70	545.00	\$6,376.50
Partner	NBN	Nick B. Nelson	18.30	495.00	\$9,058.50
Associate	SDL	Scott D. Lawrence	0.50	0.00	\$0.00
Associate	SDL	Scott D. Lawrence	1.40	420.00	\$588.00
			34.70		\$17,393.50

**Required Notice to Clients.**

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(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

July 6, 2020

Invoice No: 123570  
Our File No: 7066-22 JMR  
Billing through: 06/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Reporting

TOTAL FEES	\$168.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$168.00
NET BALANCE FORWARD	\$6,659.50
TOTAL BALANCE NOW DUE	<div>\$6,827.50</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP  
Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax No. 45-4183914

July 6, 2020

Invoice No. 123570  
Reference No. 7066-22 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Reporting

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122442	06/22/2020	22	JMR	\$6,659.50	\$6,659.50
Total Outstanding Balance					\$6,659.50
Total Amount Due on this Invoice					\$168.00
Total Balance Now Due					<u>\$6,827.50</u>

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$6,659.50	\$0.00	\$0.00	\$0.00	\$0.00	\$6,659.50

Please remit payment within 30 days. Thank you!

Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

July 6, 2020

Invoice No: 123570  
Our File No: 7066-22 JMR  
Billing through: 06/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

Reporting

Balance forward as of invoice dated 06/22/2020	\$6,659.50
Payments received since last invoice	\$0.00
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$6,659.50</u>
Trust balance carried forward	\$0.00

FOR PROFESSIONAL SERVICES RENDERED

06/20/2020	JMR	Review, finalize and file May MOR (0.2); correspondence on same (0.1)	0.30 hrs	560 /hr	168.00
Total fees for this matter			<u>0.30 hrs</u>		<u>168.00</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP	Page 1
For Professional Services Rendered	Invoice No: 123570
	Invoice through: 06/30/2020

**BILLING SUMMARY**

TOTAL FEES	\$168.00
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$168.00
NET BALANCE FORWARD	\$6,659.50
TOTAL BALANCE NOW DUE	\$6,827.50

**Timekeeper Summary**

Name	Hours	Rate	Amount
Partner JMR Jason M Rudd	0.30	560.00	\$168.00
	0.30		\$168.00

**Required Notice to Clients.**

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(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

July 6, 2020

Invoice No: 123571  
Our File No: 7066-19 JMR  
Billing through: 06/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Plan and Disclosure Statement

TOTAL FEES	\$9,871.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$9,871.00
NET BALANCE FORWARD	\$7,586.50
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$17,457.50</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

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(214) 692-6255  
Federal Tax No. 45-4183914

July 6, 2020

Invoice No. 123571  
Reference No. 7066-19 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Plan and Disclosure Statement

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122437	06/22/2020	19	JMR	\$7,586.50	\$7,586.50
Total Outstanding Balance					\$7,586.50
Total Amount Due on this Invoice					\$9,871.00
Total Balance Now Due					<u>\$17,457.50</u>

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$7,586.50	\$0.00	\$0.00	\$0.00	\$0.00	\$7,586.50

Please remit payment within 30 days. Thank you!

# Wick Phillips Gould & Martin, LLP

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(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

July 6, 2020

Invoice No: 123571  
Our File No: 7066-19 JMR  
Billing through: 06/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

## Plan and Disclosure Statement

Balance forward as of invoice dated 06/22/2020	\$7,586.50
Payments received since last invoice	\$0.00
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$7,586.50</u>
Trust balance carried forward	\$0.00

## FOR PROFESSIONAL SERVICES RENDERED

06/01/2020	JMR	Review and revise stipulation waiving deadline to file plan (0.2); correspondence with T. Scannell on same (0.1)	0.30 hrs	560 /hr	168.00
06/05/2020	JMR	Correspondence with K. Mercer and R. Horton to advance plan formulation and negotiations (0.2); correspondence and call with Trustee on same (0.3)	0.50 hrs	560 /hr	280.00
06/09/2020	JMR	Telephone conference with G. Milligan regarding advancing negotiations of creditor treatment in plan and related issues (0.3); correspondence with K. Mercer on same (0.1)	0.40 hrs	560 /hr	224.00
06/10/2020	JMR	Telephone conference with T. Scannell regarding advancing negotiations for creditor recoveries (0.3); correspondence with G. Milligan on updates from same (0.2)	0.50 hrs	560 /hr	280.00
06/11/2020	JMR	Correspondence with T. Scannell and Trustee team regarding Trustee and Romspen conference on plan developments and related issues (0.2)	0.20 hrs	560 /hr	112.00
06/12/2020	JMR	Settlement and negotiation conference with Romspen, Trustee and counsel to advance plan and creditors negotiations (0.9)	0.90 hrs	560 /hr	504.00
06/16/2020	DGJ	Research disclosure statement forms (1.0)	1.00 hrs	335 /hr	N/C
06/22/2020	SDL	Review proposed form of disclosure statement prepared by D. Heringer (.5); extensive correspondence to L. Drawhorn and D. Heringer regarding same, including notes on relevant documents, case history, solicitation procedures motion, and other matters (1.4).	1.90 hrs	420 /hr	798.00
06/23/2020	LKD	Analyze and review background information in	1.30 hrs	475 /hr	617.50

		Page		1	
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP		Invoice No:		123571	
For Professional Services Rendered		Invoice through:		06/30/2020	
	connection with strategy for disclosure statement, plan, and motion to approve same.				
06/23/2020	SDL	Call with L. Drawhorn regarding disclosure statement and solicitation procedures motion.	0.60 hrs	420 /hr	252.00
06/24/2020	DGJ	Pursue strategy re. drafting disclosure statement (0.4)	0.40 hrs	335 /hr	134.00
06/24/2020	LKD	Continue to work on strategy for disclosure statement and discuss same with D. Heringer.	0.90 hrs	475 /hr	427.50
06/24/2020	SDL	Correspondence with E. White, J. Rudd, L. Drawhorn and Trustee regarding liquidation analysis for plan and disclosure statement.	0.20 hrs	420 /hr	84.00
06/25/2020	DGJ	Draft disclosure statement (4.0)	4.00 hrs	335 /hr	1,340.00
06/28/2020	LKD	Begin working on disclosure statement.	0.80 hrs	475 /hr	380.00
06/29/2020	JMR	Telephone conference with T. Scanell regarding advancing plan negotiations and drafting (0.6); correspondence with trustee team with update and next steps on same (0.3); coordinate with S. Lawrence on same (0.1)	1.00 hrs	560 /hr	560.00
06/29/2020	SDL	Correspondence with J. Rudd and L. Drawhorn regarding status and next steps in plan and disclosure statement drafting process.	0.10 hrs	420 /hr	42.00
06/30/2020	JMR	Correspondence and approve stipulation for extension of milestone (0.3)	0.30 hrs	560 /hr	168.00
06/30/2020	LKD	Continue analyzing background information and related pleadings, continue working on disclosure statement, discuss same, case updates, and strategy for plan and disclosure statement with S. Lawrence.	5.60 hrs	475 /hr	2,660.00
06/30/2020	SDL	Call with Trustee and J. Rudd regarding plan and disclosure statement milestones, notice of waiver of same, and next steps in drafting (.2); draft notice of waiver of July 1 milestone (.2); correspondence with J. Rudd and revisions to same (.1); correspondence to Trustee and then T. Scannell regarding same (.1); call with L. Drawhorn regarding plan and disclosure statement drafting (.7); follow up correspondence with L. Drawhorn regarding additional documents for DS development (.2); revisions to notice of waiver of July 1 milestone and correspondence with T. Scannell and B. Ramirez regarding same (.5).	2.00 hrs	420 /hr	840.00
Total fees for this matter			22.90 hrs		9,871.00

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 2 Invoice No: 123571 Invoice through: 06/30/2020
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**BILLING SUMMARY**

TOTAL FEES	\$9,871.00
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$9,871.00
NET BALANCE FORWARD	\$7,586.50
TOTAL BALANCE NOW DUE	\$17,457.50

**Timekeeper Summary**

Name			Hours	Rate	Amount
Associate	DGJ	Daniella G. Heringer	1.00	0.00	\$0.00
Associate	DGJ	Daniella G. Heringer	4.40	335.00	\$1,474.00
Partner	JMR	Jason M Rudd	4.10	560.00	\$2,296.00
Partner	LKD	Lauren K. Drawhorn	8.60	475.00	\$4,085.00
Associate	SDL	Scott D. Lawrence	4.80	420.00	\$2,016.00
			22.90		\$9,871.00

**Required Notice to Clients.**

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## Wick Phillips Gould & Martin, LLP

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(214) 692-6200 phone  
(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

July 6, 2020

Invoice No: 123572  
Our File No: 7066-03 JMR  
Billing through: 06/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Asset Analysis and Recovery

TOTAL FEES	\$4,118.50
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$4,118.50
NET BALANCE FORWARD	\$13,166.00
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$17,284.50</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

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Dallas, TX 75204  
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(214) 692-6255  
Federal Tax No. 45-4183914

July 6, 2020

Invoice No. 123572  
Reference No. 7066-03 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Asset Analysis and Recovery

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122449	06/22/2020	03	JMR	\$13,166.00	\$13,166.00
Total Outstanding Balance					\$13,166.00
Total Amount Due on this Invoice					\$4,118.50
Total Balance Now Due					<u>\$17,284.50</u>

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$13,166.00	\$0.00	\$0.00	\$0.00	\$0.00	\$13,166.00

Please remit payment within 30 days. Thank you!

**Wick Phillips Gould & Martin, LLP**

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Federal Tax ID: 45-4183914

July 6, 2020

Invoice No: 123572  
Our File No: 7066-03 JMR  
Billing through: 06/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Asset Analysis and Recovery**

Balance forward as of invoice dated 06/22/2020	\$13,166.00
Payments received since last invoice	\$0.00
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$13,166.00</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

06/01/2020	CCK	Review and analyze package policy coverages; review and analyze umbrella policy; draft lengthy e-mail addressing potential benefits of general contractor' workers' compensation, business auto, package and umbrella policies.	4.20 hrs	560 /hr	2,352.00
06/01/2020	JMR	Review of C. Keeble analysis of contractor insurance coverage and benefit to estate of same (0.2); correspondence with G. Milligan and trustee team on same (0.1)	0.30 hrs	560 /hr	168.00
06/10/2020	SDL	Calls and correspondence with E. White and D. Williamson regarding prepetition transfers and potential estate assets (.5); call with D. Williamson and D. Rushing regarding same and questions regarding schedules and statement of financial affairs (.4); follow up call with Trustee to discuss same (.1); correspondence with Trustee and D. Williamson regarding Summer Legacy (.1);	0.90 hrs	420 /hr	378.00
06/22/2020	CCK	Review client e-mail (0.1); review Starr policy binder (0.3); review builder's risk policy and prior analysis of fungi coverage afforded by builder's risk policy (0.9); review client insurance coverage summary chart (0.2).	1.50 hrs	560 /hr	840.00
06/23/2020	CCK	Prepare for and participate in conference call with client regarding availability of insurance coverage for mold damage.	0.50 hrs	560 /hr	280.00
06/30/2020	DGJ	Pursue strategy re. analyzing legal authorities pertaining to preferences (0.3)	0.30 hrs	335 /hr	100.50
06/30/2020	SDL	Call with D. Heringer to discuss research related to recovery on potential causes of action.	0.30 hrs	420 /hr	N/C



Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP For Professional Services Rendered		Page Invoice No: Invoice through:	1 123572 06/30/2020
Total fees for this matter		8.00 hrs	4,118.50

BILLING SUMMARY

TOTAL FEES	\$4,118.50
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	\$4,118.50
NET BALANCE FORWARD	\$13,166.00
TOTAL BALANCE NOW DUE	\$17,284.50

Timekeeper Summary

Name			Hours	Rate	Amount
Partner	CCK	Charles C. Keeble	6.20	560.00	\$3,472.00
Associate	DGJ	Daniella G. Heringer	0.30	335.00	\$100.50
Partner	JMR	Jason M Rudd	0.30	560.00	\$168.00
Associate	SDL	Scott D. Lawrence	0.30	0.00	\$0.00
Associate	SDL	Scott D. Lawrence	0.90	420.00	\$378.00
			8.00		\$4,118.50

Required Notice to Clients.

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Federal Tax No: 45-4183914

July 6, 2020

Invoice No: 123573  
Our File No: 7066-17 JMR  
Billing through: 06/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Meetings and Communications with Creditors

TOTAL FEES	\$1,218.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$1,218.00
NET BALANCE FORWARD	\$2,072.00
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$3,290.00</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP  
Please include invoice number on payment. Thank you!

Wick Phillips Gould & Martin, LLP

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(214) 692-6255  
Federal Tax No. 45-4183914

July 6, 2020

Invoice No. 123573  
Reference No. 7066-17 JMR

Greg Milligan  
Attn: Gregory S. Milligan

Meetings and Communications with Creditors

Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122439	06/22/2020	17	JMR	\$2,072.00	\$2,072.00
Total Outstanding Balance					\$2,072.00
Total Amount Due on this Invoice					\$1,218.00
Total Balance Now Due					\$3,290.00

Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$2,072.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,072.00

Please remit payment within 30 days. Thank you!

Wick Phillips Gould & Martin, LLP

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(214) 692-6255  
Federal Tax ID: 45-4183914

July 6, 2020

Invoice No: 123573  
Our File No: 7066-17 JMR  
Billing through: 06/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

Meetings and Communications with Creditors

Balance forward as of invoice dated 06/22/2020	\$2,072.00
Payments received since last invoice	\$0.00
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$2,072.00</u>
Trust balance carried forward	\$0.00

FOR PROFESSIONAL SERVICES RENDERED

06/02/2020	SDL	Correspondence with creditor regarding notice of waiver.	0.10 hrs	420 /hr	42.00
06/07/2020	JMR	Analysis of correspondence with D. Williamson regarding press reporting on estate's project and trustee response to same (0.1)	0.20 hrs	560 /hr	112.00
06/08/2020	JMR	Telephone conference with K. Mercer and G. Milligan regarding creditor meeting and related plan negotiations (0.5); appear for and represent trustee at creditor conference lead by K. Mercer, Panache and other creditors (1.2); telephone conference with G. Milligan on next steps from same (0.2).	1.90 hrs	560 /hr	1,064.00
Total fees for this matter			<u>2.20 hrs</u>		<u>1,218.00</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 1 Invoice No: 123573 Invoice through: 06/30/2020
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**BILLING SUMMARY**

TOTAL FEES	\$1,218.00
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$1,218.00
NET BALANCE FORWARD	\$2,072.00
TOTAL BALANCE NOW DUE	\$3,290.00

**Timekeeper Summary**

Name		Hours	Rate	Amount
Partner	JMR Jason M Rudd	2.10	560.00	\$1,176.00
Associate	SDL Scott D. Lawrence	0.10	420.00	\$42.00
		2.20		\$1,218.00

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July 6, 2020

Invoice No: 123574  
Our File No: 7066-04 JMR  
Billing through: 06/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Asset Disposition

TOTAL FEES	\$7,966.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$7,966.00
NET BALANCE FORWARD	\$3,370.00
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$11,336.00</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP  
Please include invoice number on payment. Thank you!

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(214) 692-6255  
Federal Tax No. 45-4183914

July 6, 2020

Invoice No. 123574  
Reference No. 7066-04 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Asset Disposition

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122448	06/22/2020	04	JMR	\$3,370.00	\$3,370.00
Total Outstanding Balance					\$3,370.00
Total Amount Due on this Invoice					\$7,966.00
Total Balance Now Due					<u>\$11,336.00</u>

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$3,370.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,370.00

Please remit payment within 30 days. Thank you!

**Wick Phillips Gould & Martin, LLP**

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Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

July 6, 2020

Invoice No: 123574  
Our File No: 7066-04 JMR  
Billing through: 06/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Asset Disposition**

Balance forward as of invoice dated 06/22/2020	\$3,370.00
Payments received since last invoice	\$0.00
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$3,370.00</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

06/02/2020	JMR	Correspondence with Romspen, T. Scannell, Trustee and broker to arrange negotiation meeting on broker employment and compensation terms (0.4); telephone conferences (2) with G. Millian on advancing next steps on same (0.3)	0.70 hrs	560 /hr	392.00
06/03/2020	JMR	Portion of Trustee team call regarding broker retention negotiations (0.2); correspondence with T. Scannell on same (0.2); telephone conference with G. Milligan to advance same (0.2)	0.60 hrs	560 /hr	336.00
06/04/2020	JMR	Correspondence with T. Scannell and regarding advancing broker retention and related marketing process issues (0.3); telephone conference and correspondence with Trustee on same (0.3)	0.60 hrs	560 /hr	336.00
06/05/2020	JMR	Portion of Trustee team call regarding broker selection to advance marketing of property (0.3); correspondence and telephone conference with T. Scannell on same (0.3)	0.60 hrs	560 /hr	336.00
06/06/2020	JMR	Telephone conference with G. Milligan and T. Scannell regarding broker options, funding and strategy to market and sell development (0.5)	0.50 hrs	560 /hr	280.00
06/08/2020	JMR	Telephone conference with D. Williamson regarding status of PDA, broker retention and related issues (0.4)	0.40 hrs	560 /hr	224.00
06/10/2020	JMR	Correspondence on broker proposals with G. Milligan and trustee team (0.3)	0.30 hrs	560 /hr	168.00
06/16/2020	JMR	Correspondence regarding broker selection and retention with Trustee and broker candidates (0.2); initial review of broker listing agreement and	0.50 hrs	560 /hr	280.00



			Page		1
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP			Invoice No:		123574
For Professional Services Rendered			Invoice through:		06/30/2020
		comment on same (0.3)			
06/17/2020	JMR	Revise Cushman listing agreement (0.7); correspondence on same (0.2)	0.90 hrs	560 /hr	504.00
06/19/2020	JMR	Strategy conference with Trustee team to advance approval of Cushman employment and marketing efforts (0.5); conference with Cushman team and Trustee team on advancing marketing efforts, final retention terms and related issues (0.5); correspondence on same with Trustee team (0.3)	1.30 hrs	560 /hr	728.00
06/20/2020	JMR	Analysis of sample bid procedures to inform drafting of same to advance sale of property (0.4); correspondence with S. Lawrence on same (0.1)	0.50 hrs	560 /hr	280.00
06/21/2020	SDL	Work on draft bidding procedures motion.	1.30 hrs	420 /hr	546.00
06/22/2020	SDL	Continue draft and developing background for bid procedures motion.	0.90 hrs	420 /hr	N/C
06/23/2020	JMR	Correspondence and telephone conference with T. Scannell regarding broker engagement and advancing marketing process (0.3); analysis of Romspen requests and respond to same (0.4); correspondence on due diligence preparations (0.3)	1.00 hrs	560 /hr	560.00
06/23/2020	SDL	Continue work on bid procedures motion.	0.60 hrs	420 /hr	252.00
06/24/2020	JMR	Trustee team call to to finalize broker employment and kick off marketing effort (0.4); correspondence with T. Scannell on final terms on same (0.3); correspondence with Trustee on same (0.4)	1.10 hrs	560 /hr	616.00
06/25/2020	JMR	Portion of Trustee team call to address advancing broker employment (0.3); final approval and filing of broker retention pleadings (0.3); correspondence with T. Scannell on same (0.1); correspondence with D. Williamson and T. Scannell on additional information for due diligence dataroom (0.3)	1.00 hrs	560 /hr	560.00
06/25/2020	SDL	Call with Trustee, J. Rudd and E. White regarding additional document requests to various parties to ensure proper due diligence.	0.20 hrs	420 /hr	84.00
06/26/2020	JMR	Telephone conferences (2) with G. Milligan regarding broker oversight and communications with bidders (0.3); revise correspondence on same (0.3); telephone conference with T. Scannell on same and related issues (0.2); follow up correspondence on dataroom and broker issues (0.5)	1.30 hrs	560 /hr	728.00
06/29/2020	JMR	Telephone conference and correspondence with G. Milligan on broker marketing and lease related issues (0.3); Portion of trustee team strategy call on same (0.3)	0.60 hrs	560 /hr	336.00
06/29/2020	SDL	Continue revisions to bid procedures motion.	0.40 hrs	420 /hr	168.00
06/30/2020	JMR	Correspondence on broker marketing and dataroom with Trustee team and D. Williamson (0.3)	0.30 hrs	560 /hr	168.00
06/30/2020	SDL	Multiple correspondences and call with J. Rudd, Trustee, and E. White concerning marketing process, timing, and progress.	0.20 hrs	420 /hr	84.00
Total fees for this matter			15.80 hrs		7,966.00

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP	Page 2
For Professional Services Rendered	Invoice No: 123574
	Invoice through: 06/30/2020

**BILLING SUMMARY**

TOTAL FEES	\$7,966.00
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$7,966.00
NET BALANCE FORWARD	\$3,370.00
TOTAL BALANCE NOW DUE	\$11,336.00

**Timekeeper Summary**

Name			Hours	Rate	Amount
Partner	JMR	Jason M Rudd	12.20	560.00	\$6,832.00
Associate	SDL	Scott D. Lawrence	0.90	0.00	\$0.00
Associate	SDL	Scott D. Lawrence	2.70	420.00	\$1,134.00
			15.80		\$7,966.00

**Required Notice to Clients.**

THE STATE BAR OF TEXAS INVESTIGATES AND PROSECUTES PROFESSIONAL MISCONDUCT COMMITTED BY TEXAS ATTORNEYS. ALTHOUGH NOT EVERY COMPLAINT AGAINST OR DISPUTE WITH A LAWYER INVOLVES PROFESSIONAL MISCONDUCT, THE STATE BAR'S OFFICE OR GENERAL COUNSEL WILL PROVIDE YOU WITH INFORMATION ABOUT HOW TO FILE A COMPLAINT. PLEASE CALL 1-800-932-1900 TOLL-FREE FOR MORE INFORMATION.

## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200 phone  
(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

July 6, 2020

Invoice No: 123575  
Our File No: 7066-08 JMR  
Billing through: 06/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Business Operations

TOTAL FEES	\$6,286.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$6,286.00
NET BALANCE FORWARD	\$5,026.00
TOTAL BALANCE NOW DUE	<div>\$11,312.00</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax No. 45-4183914

July 6, 2020

Invoice No. 123575  
Reference No. 7066-08 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Business Operations

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122446	06/22/2020	08	JMR	\$5,026.00	\$5,026.00
Total Outstanding Balance					\$5,026.00
Total Amount Due on this Invoice					\$6,286.00
Total Balance Now Due					<u>\$11,312.00</u>

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$5,026.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,026.00

Please remit payment within 30 days. Thank you!

Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

July 6, 2020

Invoice No: 123575  
Our File No: 7066-08 JMR  
Billing through: 06/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

Business Operations

Balance forward as of invoice dated 06/22/2020	\$5,026.00
Payments received since last invoice	\$0.00
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$5,026.00</u>
Trust balance carried forward	\$0.00

FOR PROFESSIONAL SERVICES RENDERED

06/01/2020	SDL	Call with Trustee, E. White and J. Rudd regarding critical vendor motion and insurance payments (.3); revisions to and correspondence to circulate same (.5); call with E. White regarding revisions and updates to total amounts sought to pay (.4).	1.20 hrs	420 /hr	504.00
06/02/2020	SDL	Multiple calls and correspondence with Trustee, E. White, A. Zarafshani and A. Woodham regarding critical vendor motion and predicates thereof.	2.20 hrs	420 /hr	924.00
06/03/2020	SDL	Additional background research on legal basis for critical vendor payments and breadth of same.	0.60 hrs	420 /hr	252.00
06/04/2020	SDL	Call with Trustee, E White and J. Rudd to prepare for critical vendor discussion (.2); review proposed critical vendor payment requests (.6); call with Panache personnel, Trustee and E. White regarding proposed critical vendor payments (.4); follow up call with Trustee and E. White regarding same (.5); correspondence with title company and Trustee regarding funds being held for benefit of Debtor (.1).	1.80 hrs	420 /hr	756.00
06/05/2020	SDL	Review proposed final budget and multiple correspondences with Trustee, E. White and J. Rudd regarding same.	1.30 hrs	420 /hr	546.00
06/09/2020	SDL	Multiple correspondences with Trustee and Panache regarding critical vendor list and probable phishing scam.	0.70 hrs	420 /hr	294.00
06/10/2020	SDL	Call with Trustee, A. Zarafshani, A. Woodham and E. White regarding critical vendor payments and additional disclosures from Panache (.6); follow up correspondences related to same (.4).	1.00 hrs	420 /hr	420.00

			Page		1
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP			Invoice No:		123575
For Professional Services Rendered			Invoice through:		06/30/2020
06/11/2020	SDL	Review new analysis of potential critical vendor claims (.1); call with Trustee, E. White and J. Rudd to discuss critical vendor negotiations and strategy, potential additional construction oversight options, and vendor background and connection inquiries (.3);	0.40 hrs	420 /hr	168.00
06/18/2020	SDL	Review news reports of new Tesla facility and correspondence to Trustee regarding same.	0.30 hrs	420 /hr	N/C
06/23/2020	SDL	Correspondence with Trustee, J. Rudd and E. White regarding vendor agreements, vendor negotiations, and prepetition claims.	0.70 hrs	420 /hr	294.00
06/24/2020	SDL	Revisions to proposed vendor agreement related to customary trade terms (2.3); correspondence to Trustee regarding same (.2); revisions to form of prepetition vendor claim payment motion and correspondence to Trustee and J. Rudd regarding same (1.8).	4.30 hrs	420 /hr	1,806.00
06/30/2020	JMR	Telephone conference with G. Milligan regarding Panache oversight and nextsteps (0.2)	0.20 hrs	560 /hr	112.00
06/30/2020	SDL	Multiple correspondences with Trustee and A. Zarafshani regarding meeting related to project on property.	0.50 hrs	420 /hr	210.00
Total fees for this matter			15.20 hrs		6,286.00

**BILLING SUMMARY**

TOTAL FEES	\$6,286.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	\$6,286.00
NET BALANCE FORWARD	\$5,026.00
TOTAL BALANCE NOW DUE	\$11,312.00

**Timekeeper Summary**

Name			Hours	Rate	Amount
Partner	JMR	Jason M Rudd	0.20	560.00	\$112.00
Associate	SDL	Scott D. Lawrence	0.30	0.00	\$0.00
Associate	SDL	Scott D. Lawrence	14.70	420.00	\$6,174.00
			15.20		\$6,286.00

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(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

July 6, 2020

Invoice No: 123576  
Our File No: 7066-09 JMR  
Billing through: 06/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Case Administration

TOTAL FEES	\$532.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$532.00
NET BALANCE FORWARD	\$2,688.00
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$3,220.00</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP  
Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax No. 45-4183914

July 6, 2020

Invoice No. 123576  
Reference No. 7066-09 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Case Administration

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122445	06/22/2020	09	JMR	\$2,688.00	\$2,688.00
Total Outstanding Balance					\$2,688.00
Total Amount Due on this Invoice					\$532.00
Total Balance Now Due					<u>\$3,220.00</u>

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$2,688.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,688.00

Please remit payment within 30 days. Thank you!



**Wick Phillips Gould & Martin, LLP**

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Dallas, TX 75204  
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(214) 692-6255  
Federal Tax ID: 45-4183914

July 6, 2020

Invoice No: 123576  
Our File No: 7066-09 JMR  
Billing through: 06/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

Case Administration

Balance forward as of invoice dated 06/22/2020	\$2,688.00
Payments received since last invoice	\$0.00
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$2,688.00</u>
Trust balance carried forward	\$0.00

FOR PROFESSIONAL SERVICES RENDERED

06/11/2020	JMR	Telephone conference with Trustee team regarding multiple outstanding case items and next steps, including plan formulation, contested retentions, upcoming hearings, alternative contractors and related issues (0.5)	0.50 hrs	560 /hr	280.00
06/11/2020	SDL	Review notes and correspondence and draft correspondence to J. Rudd regarding strategy, tasks, and next steps.	0.40 hrs	420 /hr	168.00
06/22/2020	SDL	Correspondence with D. Heringer regarding certificate of no objections related to interim fee procedures (.1); correspondence to B. Ramirez regarding same (.1).	0.20 hrs	420 /hr	84.00
Total fees for this matter			<u>1.10 hrs</u>		<u>532.00</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 1 Invoice No: 123576 Invoice through: 06/30/2020
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**BILLING SUMMARY**

TOTAL FEES	\$532.00
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$532.00
NET BALANCE FORWARD	\$2,688.00
TOTAL BALANCE NOW DUE	\$3,220.00

**Timekeeper Summary**

Name		Hours	Rate	Amount
Partner	JMR Jason M Rudd	0.50	560.00	\$280.00
Associate	SDL Scott D. Lawrence	0.60	420.00	\$252.00
		1.10		\$532.00

**Required Notice to Clients.**

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Federal Tax No: 45-4183914

July 6, 2020

Invoice No: 123578  
Our File No: 7066-13 JMR  
Billing through: 06/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Employment and Fee Applications

TOTAL FEES	\$32,256.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$32,256.00
NET BALANCE FORWARD	\$23,797.72
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$56,053.72</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax No. 45-4183914

July 6, 2020

Invoice No. 123578  
Reference No. 7066-13 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Employment and Fee Applications

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122443	06/22/2020	13	JMR	\$23,797.72	\$23,797.72
Total Outstanding Balance					\$23,797.72
Total Amount Due on this Invoice					\$32,256.00
Total Balance Now Due					<u>\$56,053.72</u>

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$23,797.72	\$0.00	\$0.00	\$0.00	\$0.00	\$23,797.72

Please remit payment within 30 days. Thank you!

**Wick Phillips Gould & Martin, LLP**

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

July 6, 2020

Invoice No: 123578  
Our File No: 7066-13 JMR  
Billing through: 06/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Employment and Fee Applications**

Balance forward as of invoice dated 06/22/2020	\$23,797.72
Payments received since last invoice	\$0.00
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$23,797.72</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

06/02/2020	SDL	Correspondence with T. Irion regarding fee procedures.	0.50 hrs	420 /hr	210.00
06/03/2020	JMR	Revise and comment on O'Toole employment application and supporting documents (0.4)	0.40 hrs	560 /hr	224.00
06/03/2020	SDL	Correspondence to proposed accountant regarding taxes (.1); revisions to Foran retention application (.6);	0.70 hrs	420 /hr	294.00
06/04/2020	SDL	Revisions to motion and proposed order to retain Foran and circulate to team (.7); further revisions and correspondence with Trustee regarding various revisions and administrative concerns with same (.8); correspondence with Trustee and E. White regarding budgeting for Foran compensation (.3).	1.80 hrs	420 /hr	756.00
06/05/2020	DGJ	Prepare Certificate of No Objections for application authorizing Wick Phillips as Counsel (0.4); Prepare Certificate of No Objections for application authorizing employment of HMP Advisory Holdings (0.2)	0.60 hrs	335 /hr	201.00
06/05/2020	SDL	Additional revisions to Foran application (.5); correspondence and call with M. O'Toole regarding special counsel application (.3); follow up correspondence with Trustee regarding same (.4); correspondence with B. Ramirez regarding same (.2); correspondence with D. Herringer regarding certificates of no objections (.3); revise and finalize same (.3).	2.00 hrs	420 /hr	840.00
06/08/2020	SDL	Call with Trustee to discuss O'Toole requests related to Foran retention (.1); correspondence and call with O'Toole regarding same (.7);	3.10 hrs	420 /hr	1,302.00

		Page		1
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP		Invoice No:		123578
For Professional Services Rendered		Invoice through:		06/30/2020
	correspondence to Trustee and J. Rudd regarding same (.1); review and revise new proposed engagement agreement from Foran (.6); revise application, proposed order, and declaration in support to reflect changes in new engagement letter (1.1); draft motion to expedite hearing on Foran Application (.5).			
06/09/2020	SDL	Call and correspondence with Trustee regarding FOB engagement letter (.2); correspondence to FOB regarding same (.1); review interim compensation procedures and analyze amounts of Sprouse claim subject to various different types of priority and procedures (.6); call with M. Schiffgens regarding retention of Gindler (.3); revisions to proposed engagement letter with FOB and calls with H. Adelson regarding same (.2); revisions to application and related documents to incorporate new engagement terms (.6); review White parties' objection to Irion retention application (.3); correspondence with Trustee regarding FOB application (.1).	2.40 hrs	420 /hr
				1,008.00
06/10/2020	DGJ	Pursue strategy re. drafting retention application of Gindler, Chappell, Morrison & Co. PC as accountant (0.2)	0.20 hrs	335 /hr
				67.00
06/10/2020	SDL	Call with Trustee, J. Rudd and E. White regarding preparation for hearing on retention matters (.2); correspondence with M. O'Toole and H. Adelman regarding FOB engagement letter and connections (.2); correspondence with D. Williamson and D. Rushing to schedule call for conference to discuss upcoming hearing (.1); calls and correspondence with D. Heringer regarding accountant retention pleading (.3); correspondence with T. Scannell and K. Mercer to confer regarding FOB retention (.1); call with D. Williamson and D. Rushing to confer regarding expedited hearing on FOB retention application and objection to Irion application (.5); correspondence with T. Irion regarding objection to application to employ Sprouse (.1); revisions to descriptions of connections in O'Toole declaration (.2); call with Trustee to follow up on call with D. Williamson and D. Rushing (.2); correspondence with M. O'Toole and H. Adelman regarding revisions to declaration and documentation (.2); call with H. Adelman regarding same (.2); finalize application to retain FOB and motion to expedite same for filing (.8); multiple correspondences to court and from D. Rushing regarding filing of motion to expedite and conference results regarding same (.5); revisions to certificate of service for FOB application and motion to expedite (.2); correspondence to B. Ramirez with service instructions (.1); multiple correspondences to schedule calls and next steps related to FOB application (.2); correspondence with Trustee regarding broker retention process (.1); correspondence with Court and B. Ramirez regarding notice of WebEx hearing regarding retention applications (.2); call with T. Irion, J. Rudd	5.50 hrs	420 /hr
				2,310.00

		Page		2	
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP		Invoice No:		123578	
For Professional Services Rendered		Invoice through:		06/30/2020	
	and Trustee regarding supplemental declaration related to Sprouse application and preparation for hearing related to same as well as compensation issues (1.1)				
06/11/2020	SDL	Call with Trustee, E. White and J. Rudd to discuss Supplemental Irion declaration and strategy related to hearing on same (.2); revisions to notice of hearing regarding Sprouse and FOB applications (.5); correspondence with court regarding same (.1); review Irion time records and mark up for fee statement (.5); review attachments to objection to Sprouse retention application (.3); compare objection to Sprouse retention application and declaration in support to Objection filed by White parties (.6); draft and revise supplemental declaration for T. Irion (1.5); correspondence with D. Williamson and T. Irion regarding upcoming hearing (.2); initial preparation of witness and exhibit list for hearing (.1); correspondence to M. O'Toole and counsel regarding notice of hearing and appearance requirements (.2); research additional case law on contingent fee liens and assignments (.8).	5.00 hrs	420 /hr	2,100.00
06/12/2020	SDL	Continue research into attorney lien and contingency fee protection in preparation for call with White parties' counsel (1.2); correspondence with J. Rudd regarding same (.5); preparation for call with D. Williamson regarding same (.3); call with D. Williamson, D. Rushing and J. Rudd to confer regarding matters for June 18 (.5); work on supplement to Milligan declaration in support of Sprouse retention (.6); correspondence to T. Irion regarding supplemental declaration in support of Sprouse Application (.1); hearing preparation call with J. Rudd regarding same (.4); review Irion Declaration (.4); review new fee statements and correspondence to Sprouse paralegal and Trustee regarding same (.2).	4.20 hrs	420 /hr	1,764.00
06/13/2020	SDL	Revisions to Milligan declaration to bolster Sprouse application and PDA process (.3); correspondence to J. Rudd regarding draft of supplemental Irion Declaration (.4); draft correspondence to Trustee regarding call with White counsel (.3); continue revisions to Milligan declaration related to support of Irion retention (2.7); draft section of Milligan declaration in support of O'Toole retention (.3); correspondence to Trustee regarding same (.2).	4.20 hrs	420 /hr	1,764.00
06/14/2020	SDL	Correspondence regarding Milligan declaration and revisions thereto related to retention motions (.2); call and correspondence with B. Ramirez regarding preparation of exhibits for June 18 hearing (.6); calls and correspondence with T. Irion and Trustee regarding declarations and revisions thereto related to retention motions (1.3); revisions to Milligan and Irion Declarations (.6).	2.70 hrs	420 /hr	1,134.00
06/15/2020	DGJ	Draft Retention Application to authorize employment of Gindler, Chappell, Morrison & Co. PC (1.4); draft Order Granting Retention Application to authorize employment of Gindler, Chappell, Morrison & Co.	2.00 hrs	335 /hr	670.00

		Page		3	
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP		Invoice No:		123578	
For Professional Services Rendered		Invoice through:		06/30/2020	
06/15/2020	SDL	PC (0.2); draft Schiffgens Declaration in support of Retention Application to authorize employment of Gindler, Chappell, Morrison & Co. PC (0.4) Review and revise Irion declaration and Milligan declaration in preparation for June 18 hearing regarding retention applications (.9); call with Trustee to discuss same (.1); correspondences with T. Irion regarding same (.1); finalize Milligan and Irion declarations regarding professional retention issues (.5); multiple correspondences with B. Ramirez and J. Rudd concerning exhibits for hearing and list of same and service of same (.3); correspondence to T. Irion regarding hearing and exhibits (.2); correspondence to H. Adelman and M. O'Toole regarding hearing and exhibits (.3); develop hearing strategy and plan regarding retention applications for June 18 hearing (.8); correspondence and calls with D. Heringer regarding accountant retention application (.2); correspondence to Court regarding exhibits (.1).	3.50 hrs	420 /hr	1,470.00
06/16/2020	SDL	Call with J. Rudd, Trustee, and E. White regarding hearing preparation for Sprouse and O'Toole applications (.2); correspondence to D. Heringer regarding accountant application (.1); correspondence to T. Irion regarding hearing preparation (.2); correspondence to Trustee regarding Irion declaration and Debtor's resolution regarding pursuing the PDA (.1); correspondence to M. O'Toole and H. Adelman regarding hearing preparation (.1); revisions to parties in interest list and correspondence to M. Schiffgens regarding same (.3); review proposed broker agreement and correspondence from Trustee regarding same (.4); call with M. O'Toole to discuss hearing preparation (.2); correspondence to M. O'Toole regarding same (.2); additional preparation, strategy, and correspondence regarding Dan White objections to retention (1.1); conference with counsel for White parties to try to reduce contested matters for hearing (.5).	3.40 hrs	420 /hr	1,428.00
06/17/2020	DGJ	Analyze, review, and revise Retention Application to authorize employment of Gindler, Chappell, Morrison & Co. PC (0.2); analyze, review, and revise Declaration in Support of Retention Application to authorize employment of Gindler, Chappell, Morrison & Co. PC (0.2); convert broker retention application to retention application re, Cushman Wakefield (0.8); convert Order Granting retention application of broker to Order Granting retention application of Cushman Wakefield (0.1); convert Coddington Declaration in Support of retention application of JLL to Declaration in Support of retention application re. Cushman Wakefield (0.3)	1.60 hrs	335 /hr	536.00
06/17/2020	SDL	Correspondence with D. Heringer regarding broker retention application (.1); continue reviewing exhibits, developing questions for direct examination of O'Toole and anticipating cross, and begin opening and closing statements for hearing on FOB	7.90 hrs	420 /hr	3,318.00



		Page		4	
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP		Invoice No:		123578	
For Professional Services Rendered		Invoice through:		06/30/2020	
	retention application (2.2); call with M. O'Toole, H. Adelman, J. Rudd & Trustee regarding probable cross examination at hearing (.9); call with T. Irion, J. Rudd & Trustee regarding probable cross examination at hearing (.9); call with M. O'Toole regarding next steps after retention (.3); continue reviewing exhibits, developing questions for direct examination of O'Toole and anticipating cross, and begin opening and closing statements for hearing on FOB retention application (3.2); correspondence to J. Rudd regarding stipulation to admissibility of D. White's exhibits (.3).				
06/18/2020	SDL	Final preparations for hearing, including completion of drafts of outlines for opening and closing statements on retention applications (2.6); call with J. Rudd, Trustee and E. White regarding same (.5); attend hearing telephonically on retention of FOB and Sprouse (2.4); follow up call with Trustee, E. White and J. Rudd (.3); correspondence to M. O'Toole with order granting retention (.1); revisions to order granting retention of Sprouse (.3);	6.20 hrs	420 /hr	2,604.00
06/19/2020	SDL	Call with Trustee, J. Rudd and E. White concerning broker retention (.2); multiple correspondences with Trustee regarding same (.5); revisions to application to retain Cushman and Wakefield as real property broker (1.9); call with C&W regarding same (.6); additional revisions to broker application, declaration in support, and proposed order (1.7); additional correspondence with proposed accountant (.1).	5.00 hrs	420 /hr	2,100.00
06/20/2020	JMR	Revise and comment on C&W broker retention pleadings (0.5)	0.50 hrs	560 /hr	280.00
06/21/2020	SDL	Revisions to application to retain real property broker and correspondence with J. Rudd and Trustee regarding same.	1.10 hrs	420 /hr	N/C
06/22/2020	DGJ	Prepare Certificate of No Objections for Procedures of Interim Compensation and Reimbursement of Expenses for Professionals (0.2)	0.20 hrs	335 /hr	67.00
06/22/2020	JMR	Strategy conference with Trustee team to advance approval of Broker retention (0.3); correspondence on same (0.3); telephone conferences (2) with T. Scannell on final comments and terms (0.4); correspondence with G. Milligan and trustee team on advancing resolution of same (0.5); telephone conference with G. Milligan on same (0.3); follow up correspondence with G. Milligan and T. Scannell on same (0.3)	2.10 hrs	560 /hr	1,176.00
06/22/2020	SDL	Call with Trustee, J. Rudd and E. White regarding broker retention (.2); correspondence to C&W regarding same (.4); draft motion to expedite and proposed order granting related to same (.5); correspondence with J. Rudd and T. Scannell to confer regarding same (.3); correspondence with J. Rudd and Trustee regarding same (.3).	1.70 hrs	420 /hr	714.00
06/23/2020	SDL	Call with Trustee, J. Rudd and E. White regarding interim fee procedures (.1); call with M. O'Toole regarding next steps and execution of engagement	3.30 hrs	420 /hr	1,386.00

		Page		5	
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP		Invoice No:		123578	
For Professional Services Rendered		Invoice through:		06/30/2020	
	letter (.2); multiple correspondences with Trustee and T. Mills regarding declaration and potential revisions (.3); review fee statements from Harney and WP (.1); correspondences with T. Irion regarding Sprouse fee statement (.8); multiple correspondences with B. Ramirez regarding finalizing broker retention motion and motion to expedite same (.3); review revisions to declaration and call with T. Mills regarding same (1.4).				
06/24/2020	JMR	Final approval of fee statement notice and correspondence on same (0.2)	0.20 hrs	560 /hr	112.00
06/24/2020	SDL	Call with Trustee, J. Rudd and E. White concerning broker retention (.2); correspondences related thereto (.1); correspondence with T. Irion regarding fee statement (.3); draft correspondence related to fee statements in accordance with interim fee procedures order (.9); calls and correspondences with T. Mills, Trustee and J. Rudd regarding broker retention (.6); correspondence with Trustee regarding accountant retention (.1).	2.20 hrs	420 /hr	924.00
06/25/2020	BR	Finalize retention application; file and serve re same.	2.20 hrs	165 /hr	363.00
06/25/2020	SDL	Call with Trustee, J. Rudd and E. White to discuss status of broker retention (.2); Correspondence with T. Mills regarding revisions to declaration (.1); revisions to declaration in support of broker retention (.6); revisions to finalize application, proposed order, and exhibits to broker retention pleadings (.8); correspondence with B. Ramirez regarding same (.1).	1.80 hrs	420 /hr	756.00
06/26/2020	SDL	Correspondence with Trustee regarding broker retention.	0.10 hrs	420 /hr	42.00
06/28/2020	SDL	Correspondence with Trustee and A. Zarafshani regarding accountant retention.	0.20 hrs	420 /hr	84.00
06/29/2020	SDL	Correspondence and calls related to accountant retention and interim fee procedures timing.	0.40 hrs	420 /hr	168.00
06/30/2020	SDL	Review Schiffgens engagement letter and correspondence to Schiffgens regarding same.	0.20 hrs	420 /hr	84.00
Total fees for this matter			79.10 hrs		32,256.00

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 6 Invoice No: 123578 Invoice through: 06/30/2020
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**BILLING SUMMARY**

TOTAL FEES	\$32,256.00
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$32,256.00
NET BALANCE FORWARD	\$23,797.72
TOTAL BALANCE NOW DUE	\$56,053.72

**Timekeeper Summary**

Name			Hours	Rate	Amount
Legal Assistant	BR	Brenda Ramirez	2.20	165.00	\$363.00
Associate	DGJ	Daniella G. Heringer	4.60	335.00	\$1,541.00
Partner	JMR	Jason M Rudd	3.20	560.00	\$1,792.00
Associate	SDL	Scott D. Lawrence	1.10	0.00	\$0.00
Associate	SDL	Scott D. Lawrence	68.00	420.00	\$28,560.00
			79.10		\$32,256.00

**Required Notice to Clients.**

THE STATE BAR OF TEXAS INVESTIGATES AND PROSECUTES PROFESSIONAL MISCONDUCT COMMITTED BY TEXAS ATTORNEYS. ALTHOUGH NOT EVERY COMPLAINT AGAINST OR DISPUTE WITH A LAWYER INVOLVES PROFESSIONAL MISCONDUCT, THE STATE BAR'S OFFICE OR GENERAL COUNSEL WILL PROVIDE YOU WITH INFORMATION ABOUT HOW TO FILE A COMPLAINT. PLEASE CALL 1-800-932-1900 TOLL-FREE FOR MORE INFORMATION.

## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200 phone  
(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

July 6, 2020

Invoice No: 123579  
Our File No: 7066-14 JMR  
Billing through: 06/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Employment and Fee Application Objections

TOTAL FEES	\$840.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$840.00
NET BALANCE FORWARD	\$0.00
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$840.00</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

July 6, 2020

Invoice No: 123579  
Our File No: 7066-14 JMR  
Billing through: 06/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

Employment and Fee Application Objections

Balance forward as of invoice dated	\$0.00
Payments received since last invoice	\$0.00
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$0.00</u>
Trust balance carried forward	\$0.00

FOR PROFESSIONAL SERVICES RENDERED

06/10/2020	JMR	Strategy conference with T. Irion, G. Milligan and S. Lawrence on response to White objection to employment, resolution of same and preparations for potential hearing (0.5); analysis of objection (0.2); correspondence on same (0.1)	0.80 hrs	560 /hr	N/C
06/17/2020	JMR	Strategy and witness preparation conference on Sprouce employment hearing preparation and response to objections on same (0.9); witness and strategy preparation conference with O'Toole (0.6)	1.50 hrs	560 /hr	840.00
Total fees for this matter			<u>2.30 hrs</u>		<u>840.00</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 1 Invoice No: 123579 Invoice through: 06/30/2020
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BILLING SUMMARY

TOTAL FEES	\$840.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	\$840.00
NET BALANCE FORWARD	\$0.00
TOTAL BALANCE NOW DUE	\$840.00

Timekeeper Summary

Name			Hours	Rate	Amount
Partner	JMR	Jason M Rudd	0.80	0.00	\$0.00
Partner	JMR	Jason M Rudd	1.50	560.00	\$840.00
			2.30		\$840.00

Required Notice to Clients.

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## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200 phone  
(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

July 6, 2020

Invoice No: 123580  
Our File No: 7066-15 JMR  
Billing through: 06/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Financing and Cash Collateral

TOTAL FEES	\$34,250.50
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$34,250.50
NET BALANCE FORWARD	\$52,173.50
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$86,424.00</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax No. 45-4183914

July 6, 2020

Invoice No. 123580  
Reference No. 7066-15 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Financing and Cash Collateral

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122441	06/22/2020	15	JMR	\$52,173.50	\$52,173.50
Total Outstanding Balance					\$52,173.50
Total Amount Due on this Invoice					\$34,250.50
Total Balance Now Due					<u>\$86,424.00</u>

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$52,173.50	\$0.00	\$0.00	\$0.00	\$0.00	\$52,173.50

Please remit payment within 30 days. Thank you!



**Wick Phillips Gould & Martin, LLP**

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

July 6, 2020

Invoice No: 123580  
Our File No: 7066-15 JMR  
Billing through: 06/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Financing and Cash Collateral**

Balance forward as of invoice dated 06/22/2020	\$52,173.50
Payments received since last invoice	\$0.00
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$52,173.50</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

06/01/2020	JMR	Portion of Trustee strategy call to advance approval of interim budget, and related filings (0.3); Correspondence with T. Scannell regarding approval of budget and advancing broker and related retentions (0.5); telephone conference with T. Scannell on negotiation of budget terms and approval of same (0.3); final review and approval of Budget filing and related correspondence (0.3); telephone conference with G. Milligan on same (0.1)	1.50 hrs	560 /hr	840.00
06/01/2020	SDL	Draft, revise,correspond with J. Rudd & T. Scannell regarding, and finalize notice of waiver of plan filing milestone default (.8); draft, revise,correspond with J. Rudd, T. Scannell, E. White and Trustee regarding, and finalize notice of interim budget (1.6).	2.40 hrs	420 /hr	1,008.00
06/02/2020	JMR	Correspondence to coordinate negotiation conference with O.Toole and Romspen counsel (0.2); Conference call with Romspen group, counsel and T. O'Toole for approval of employment terms (0.3); conference call with T. Scannell on same (0.2); correspondence on draft DIP budget and specific strategy on handling less predictable expenses and related issues (0.3)	1.00 hrs	560 /hr	560.00
06/03/2020	JMR	Portion of Trustee team call regarding preparation of final draft DIP budget and related issues (0.2); review reservation of rights filed to porposed budget (0.2); correspondence on saem (0.1); correspondence with T. Scannell regarding approval of 2nd interim budget and funding of WE 12-Jun approved amounts (0.3)	0.80 hrs	560 /hr	448.00

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Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP			Invoice No:		123580
For Professional Services Rendered			Invoice through:		06/30/2020
06/03/2020	SDL	Correspondence to D. Williamson regarding draft budget (.1); review financing order and notice regarding deadline for parties to file objections to the proposed budget and correspondence to B. Ramirez regarding same (.5); review reservation of rights filed by D. Williamson (.1); calls with Trustee and J. Rudd regarding same (.4).	1.10 hrs	420 /hr	462.00
06/04/2020	JMR	Correspondence with T. Scannell regarding budget funding and advancing final hearing and order preparations (0.3); correspondence and portion of call with trustee team on same (0.3)	0.60 hrs	560 /hr	336.00
06/04/2020	SDL	Call with Trustee, J. Rudd and E. White regarding revisions to prepare proposed final financing order.	0.20 hrs	420 /hr	84.00
06/04/2020	SDL	Revisions to proposed motion to compromise claim (1.3); additional review of case law applicable to substantial contribution claims and equitable subrogation (.7).	2.00 hrs	420 /hr	840.00
06/05/2020	JMR	Analysis of draft final dip budget from E. White and comment on same (0.4); portion of trustee team call on same (0.2)	0.60 hrs	560 /hr	336.00
06/07/2020	JMR	Correspondence with T. Scannell regarding Final DIP Order (0.3)	0.30 hrs	560 /hr	168.00
06/08/2020	JMR	Strategy call with G. Milligan and trustee team to plan approval of final budget and final DIP Order (0.3); Analysis of draft DIP Order from T. Scannell and comments and revisions on same (1.1); telephone conference with G. Milligan on comments to DIP Order (0.3); correspondence on further DIP Order provisions (0.3); telephone conference with T. Scannell and G. Milligan to advance negotiations on proposed budget and DIP Order (0.5); telephone conference with G. Milligan and E. White on proposed budget revisions and approval of same (0.5); correspondence with T. Scannell on revised budgets, negotiations and approval of same (0.7); correspondence with G. Milligan on same (0.3); final review and approval of Final DIP Order and Final Budget and Notice of same (0.4)	4.40 hrs	560 /hr	2,464.00
06/08/2020	SDL	Review proposed revised financing order from T. Scannell (.5); incorporate revisions and certain clean up items to same (.3); draft insertions related to variance reporting and professional fee escrow (.5); calls and correspondence with E. White regarding same (.2); review and check calculations of milestone dates and substitute certain of same (.2); correspondence to Trustee, E. White and J. Rudd regarding revision documentation (.8); review proposed revisions to budget suggested by lender and analyses of same prepared by E. White and Trustee (.5); incorporate additional revisions from Trustee (.8); calls with J. Rudd regarding additional revisions (.2); review revised proposed counter-budget (.3); finalize revised proposed financing order and budget and prepare cover letter to T. Scannell for same (1.4); review revised proposed budget (.1); prepare notice cover sheet for proposed final order and associated exhibits (1.2);	7.40 hrs	420 /hr	3,108.00

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Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP			Invoice No:		123580
For Professional Services Rendered			Invoice through:		06/30/2020
06/09/2020	JMR	revisions to and finalize same (.4). Portion of strategy call with Trustee team on next steps in advancing approval of final dip order, final budget and related financing issues (0.3); Correspondence with D. Williamson and K. Mercer regarding revisions to final DIP Order (0.2)	0.50 hrs	560 /hr	280.00
06/09/2020	SDL	Call with Trustee, E. White and J. Rudd regarding next steps for financing motion and order (.2); correspondences to D. Williamson and K. Mercer regarding form of proposed final order (.1).	0.30 hrs	420 /hr	N/C
06/10/2020	BR	Finalize motions; file and serve re same.	1.50 hrs	165 /hr	247.50
06/10/2020	JMR	Analysis of White objection to Final DIP Order (0.2); correspondence with Trustee team on resolution and assessments of same (0.2)	0.40 hrs	560 /hr	224.00
06/10/2020	SDL	Call with Trustee, J. Rudd and E. White regarding preparation for final hearing on financing motion (.2); call with Trustee to discuss call with D. Williamson's strategy for financing motion hearing (.1); review D. Williamson objection to financing motion and correspondence to Trustee, J. Rudd and E. White regarding same (.5); correspondence with Court and B. Ramirez regarding notice of WebEx hearing related to financing motion (.1); correspondence with Trustee and J. Rudd regarding potential revisions to final financing order to address D. Williamson objections (.2).	1.10 hrs	420 /hr	462.00
06/11/2020	BR	Prepare notice of hearing; file and serve re same. Prepare witness and exhibit list for June 18 hearing.	1.80 hrs	165 /hr	297.00
06/11/2020	SDL	Call with Trustee, E. White and J. Rudd to discuss budget revisions (.1); correspondence regarding witness and exhibit list for hearing on financing motion (.1); begin review of objections to financing motion in preparation for June 18 hearing (.5).	0.70 hrs	420 /hr	294.00
06/12/2020	JMR	Telephone conference with D. Williamson to negotiation resolution of language and objections to DIP Order (0.7); draft revisions to DIP Order to resolve same (0.7); correspondence with T. Scannell regarding (0.2); telephone conference and correspondence with G. Milligan on developments on DIP negotiations (0.2); strategy conference with S. Lawrence on preparations for DIP hearing (0.4)	2.20 hrs	560 /hr	1,232.00
06/12/2020	SDL	Call with D. Williamson, D. Rushing, and J. Rudd regarding revisions to the financing order (.3); review proposed revisions to same and correspondence and call with J. Rudd regarding same (.5); revisions to Milligan declaration for hearing on same (.7); correspondence with B. Ramirez regarding exhibits for same (.1).	1.60 hrs	420 /hr	672.00
06/13/2020	SDL	Revisions to Milligan declaration in support of financing motion (.2); correspondence to Trustee regarding call with White counsel related to financing order (.2); continue revisions to Milligan declaration related to financing motion (1.6); correspondence to Trustee regarding same (.3).	2.30 hrs	420 /hr	966.00
06/14/2020	BR	Call with S. Lawrence re exhibits.	0.50 hrs	165 /hr	82.50
06/14/2020	JMR	Analysis and comment on G. Milligan supplemental	1.00 hrs	560 /hr	560.00

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Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP		Invoice No:		123580	
For Professional Services Rendered		Invoice through:		06/30/2020	
	affidavit (0.3); coordinate witness and exhibit list preparations for 6/18 hearings (0.2); further revisions to proposed Final DIP Order and circulate same to T. Scannell and D. Williamson (0.5)				
06/14/2020	SDL	Correspondence regarding Milligan declaration and revisions thereto related to financing motion (.2); call and correspondence with B. Ramirez regarding preparation of exhibits for June 18 hearing (.6); revisions to declaration and call with Trustee regarding same (.3).	1.10 hrs	420 /hr	462.00
06/15/2020	BR	Finalize exhibit list; file and serve re same; prepare exhibit binders.	6.50 hrs	165 /hr	1,072.50
06/15/2020	JMR	Strategy and coordination call with Trustee team to address filing of declarations and exhibits and related 6/18 hearing preparations (0.3); revisions to Final DIP Order to address resolutions of objections and related comments and circulate revised drafts and redlines of same (0.7); telephone conference with T. Scannell on same (0.2); correspondence with Trustee team with updates on same (0.3); telephone conference with K. Mercer regarding removables arguments (0.3); correspondence on same (0.2)	2.00 hrs	560 /hr	1,120.00
06/15/2020	SDL	Review correspondence and other documents and implement revisions to Trustee declaration in support of financing motion in preparation to finalize same (.4); call with Trustee to discuss same (.1); finalize declaration with respect to financing motion (.5); multiple correspondences with B. Ramirez and J. Rudd regarding Trustee's and others' exhibits for June 18 hearing (.6); correspondence with J. Rudd and T. Scannell regarding revisions to financing order (.5); additional preparation for hearing on financing motion (.4); correspondence to distribute electronic copies of the exhibits to the hearing attendees (.5); correspondence to Court regarding exhibits (.1); correspondance with D. Williamson, D. Rushing, K. Mercer and others regarding form of financing order (.2).	3.30 hrs	420 /hr	1,386.00
06/16/2020	JMR	Analysis of K. Mercer comments to DIP Order (0.2); Telephone conference with K. Mercer regarding advancing resolution of same (0.3); correspondence on further revisions to DIP Order and approval of same by White Parties, Romspen and removable lien claimants (0.8); telephone conference with R. Horton regarding resolution of sub contractor issues in advance of final DIP Order (0.4); telephone conference with D. Williamson regarding resolution of objections and related negotiations and hearing discussions (0.5); follow up call with G. Milligan on same (0.3); correspondence on further DIP Order language revisions (0.4)	2.90 hrs	560 /hr	1,624.00
06/16/2020	SDL	Call with Trustee, J. Rudd and E. White regarding preparation and review of exhibits for hearing regarding financing motion (.2); review analysis of removables objections filed by contractors related to financing motion (.1); review revisions from K. Mercer to proposed financing order (.1); additional	1.00 hrs	420 /hr	420.00

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Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP			Invoice No:	123580	
For Professional Services Rendered			Invoice through:	06/30/2020	
		preparation for hearing including development of strategy and adjustments to case developments(.4); additional correspondence, calls, and strategy development to address Dan White objections to financing motion (.4); correspondence with Trustee and B. Ramirez regarding exhibits for hearing (.2). Revised proposed final budget order.	0.40 hrs	165 /hr	66.00
06/17/2020	BR				
06/17/2020	JMR	Correspondence and follow up among objecting parties on final revisions to DIP Order and approval of same (0.6); prepare outline of arguments and presentation to court on Final DIP Order hearing (1.0); correspondence with court on time estimates and status of objections (0.3); telephone conference with T. Scannell on hearing preparations (0.4); final review and approval of proposed DIP Order to submit same to Court (0.4); strategy conference with G. Milligan to prepare for direct and cross examination and related presentation to the court on DIP Order objections and related matters set for 6/18 hearings (1.5); anlaysis of White exhibits and address objections to same (0.5)	4.70 hrs	560 /hr	2,632.00
06/17/2020	SDL	Additional correspondence with Trustee regarding exhibits (.2); call with Trustee, J.Rudd and E. White regarding probable cross examination at hearing (1.2); draft and finalize notice of revised version of proposed order for hearing (.9); correspondence to court regarding same (.1); correspondence to J. Rudd regarding stipulation to admissibility of D. White exhibits for hearing (.3).	2.70 hrs	420 /hr	1,134.00
06/18/2020	JMR	Correspondence with White counsel regarding outline of objections to exhibits (0.3)	0.30 hrs	560 /hr	168.00
06/18/2020	JMR	Telephone conference with the Trustee team on final preparations for hearing on DIP Order (0.5); telephone conference with D. Williamson regarding resolution of exhibit objections (0.3); telephone conference with Trustee on final hearing notes and questions (0.2); analysis of new objection filed by Receiver (0.2); telephone conference with T. Scannell regarding same (0.2); final revisions to presentation outline and related hearing preparations (0.8); appear for and represent trustee at hearing on final financing motion and related proceedings (3.2); revised Final Order to address court's comments and circulate same (0.4)	5.60 hrs	560 /hr	3,136.00
06/18/2020	SDL	Final preparations for hearing (.4); attend hearing on post-petition financing motion (1.5); draft notice of revisions from pre-hearing to post-hearing order (1.0); correspondence to J. Rudd and court regarding same (.2).	3.10 hrs	420 /hr	1,302.00
06/19/2020	SDL	Call and correspondence with Trustee, E. White, and J. Rudd concerning impact of new financing order on reporting requirements (.4);	0.40 hrs	420 /hr	168.00
06/22/2020	BR	Finalize certificate of no objections; file re same.	0.30 hrs	165 /hr	49.50
06/22/2020	JMR	Correspondence on budget and DIP Order compliance issues (0.2)	0.20 hrs	560 /hr	112.00
06/24/2020	JMR	Correspondence on budget funding (0.2)	0.20 hrs	560 /hr	112.00

				Page	5
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP				Invoice No:	123580
For Professional Services Rendered				Invoice through:	06/30/2020
06/24/2020	SDL	Multiple correspondences with J. Rudd and D. Heringer regarding motion to amend financing order.	0.40 hrs	420 /hr	168.00
06/25/2020	JMR	Appear for hearing on removables procedures motion and related issues (0.6); coordinate service of same (0.2)	0.80 hrs	560 /hr	448.00
06/25/2020	SDL	Discuss service of removables order with J. Rudd.	0.10 hrs	420 /hr	42.00
06/26/2020	BR	Prepare notice of entry of order; file and serve re same.	1.60 hrs	165 /hr	264.00
06/26/2020	JMR	Correspondence with T. Scannell regarding funding under DIP Budget (0.2); correspondence with K. Mercer and Panache team on service of removables scheduling order and related information (0.4); coordinate collections of m&m lien holder service information and advance service on same (0.8)	1.40 hrs	560 /hr	784.00
06/26/2020	SDL	Review and monitor correspondences with Trustee, A. Woodham, J. Rudd and K. Mercer regarding service of removables order and notice (.3); correspondence with J. Rudd regarding motion to amend (.1).	0.40 hrs	420 /hr	N/C
06/29/2020	JMR	finalize and serve budget variance report (0.2); portion of telephone conference with Trustee team on same, DIP Order milestones and related issues (0.1)	0.30 hrs	560 /hr	N/C
06/29/2020	SDL	Review and revise motion to amend final financing order (.4); review and revise order granting same (.2); review forms of order attached to proposed motion and determine additional form of order required (.3); review correspondence related to forms of final financing order exchanged as part of conference on same and form uploaded to court after hearing and reconcile revisions that occurred in the interim into new proposed form of order (.8); correspondence to J. Rudd regarding next steps (.2).	1.90 hrs	420 /hr	798.00
06/30/2020	BR	Finalize unopposed motion to amend final order; file re same.	1.10 hrs	165 /hr	181.50
06/30/2020	SDL	Discuss motion to amend financing order with J. Rudd and Trustee (.1); implement revisions thereto (.1); correspondence with T. Scannell and K. Mercer to confer regarding same (.1); correspondence with B. Ramirez regarding finalizing of same (.1); additional revisions to amended order, redline and notice (.5); additional correspondence with B. Ramirez and review to finalize (.3); correspondence with the Court, T. Scannell, K. Mercer, and J. Rudd regarding same (.3).	1.50 hrs	420 /hr	630.00
Total fees for this matter			80.40 hrs		34,250.50

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 6 Invoice No: 123580 Invoice through: 06/30/2020
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**BILLING SUMMARY**

TOTAL FEES	\$34,250.50
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$34,250.50
NET BALANCE FORWARD	\$52,173.50
TOTAL BALANCE NOW DUE	\$86,424.00

**Timekeeper Summary**

Name			Hours	Rate	Amount
Legal Assistant	BR	Brenda Ramirez	13.70	165.00	\$2,260.50
Partner	JMR	Jason M Rudd	0.30	0.00	\$0.00
Partner	JMR	Jason M Rudd	31.40	560.00	\$17,584.00
Associate	SDL	Scott D. Lawrence	0.70	0.00	\$0.00
Associate	SDL	Scott D. Lawrence	34.30	420.00	\$14,406.00
			80.40		\$34,250.50

**Required Notice to Clients.**

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## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200 phone  
(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

July 6, 2020

Invoice No: 123581  
Our File No: 7066-10 JMR  
Billing through: 06/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Claims Administration and Objections

TOTAL FEES	\$1,713.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$1,713.00
NET BALANCE FORWARD	\$630.00
TOTAL BALANCE NOW DUE	<div>\$2,343.00</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP  
Please include invoice number on payment. Thank you!



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(214) 692-6200  
(214) 692-6255  
Federal Tax No. 45-4183914

July 6, 2020

Invoice No. 123581  
Reference No. 7066-10 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Claims Administration and Objections

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122444	06/22/2020	10	JMR	\$630.00	\$630.00
Total Outstanding Balance					\$630.00
Total Amount Due on this Invoice					\$1,713.00
Total Balance Now Due					<u>\$2,343.00</u>

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$630.00	\$0.00	\$0.00	\$0.00	\$0.00	\$630.00

Please remit payment within 30 days. Thank you!

**Wick Phillips Gould & Martin, LLP**

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Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

July 6, 2020

Invoice No: 123581  
Our File No: 7066-10 JMR  
Billing through: 06/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Claims Administration and Objections**

Balance forward as of invoice dated 06/22/2020	\$630.00
Payments received since last invoice	\$0.00
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$630.00</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

06/01/2020	SDL	Call with lien creditor counsel regarding case status.	0.20 hrs	420 /hr	84.00
06/05/2020	SDL	Review application for administrative claim filed by K. Mercer.	0.20 hrs	420 /hr	84.00
06/10/2020	DGJ	Research forms for 503(b)(9) claim bar date motion (0.4); confer re. strategy of 503(b)(9) claim bar date motion (0.2)	0.60 hrs	335 /hr	201.00
06/10/2020	SDL	Correspondence with D. Heringer regarding form of 503(b)(9) bar date motion (.2); review forms proposed by D. Heringer (.4); call with D. Heringer to discuss commencing draft of same (.2); call with J. Rudd to discuss timelines and impracticality of filing same (.3).	1.10 hrs	420 /hr	462.00
06/16/2020	JMR	Correspondence with counsel for receiver and Romspen regarding asserted admin claim for receiver fees and expenses (0.3); analysis of draft motion on same (0.3)	0.60 hrs	560 /hr	336.00
06/16/2020	SDL	Multiple correspondences and first review of receiver's request for administrative expense claim related to custodial costs.	0.50 hrs	420 /hr	210.00
06/25/2020	SDL	Review and report on petitioning creditors' request for allowance of administrative claim to Trustee.	0.80 hrs	420 /hr	336.00
Total fees for this matter			<u>4.00 hrs</u>		<u>1,713.00</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP For Professional Services Rendered	Page 1 Invoice No: 123581 Invoice through: 06/30/2020
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**BILLING SUMMARY**

TOTAL FEES	\$1,713.00
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$1,713.00
NET BALANCE FORWARD	\$630.00
TOTAL BALANCE NOW DUE	\$2,343.00

Timekeeper Summary

Name			Hours	Rate	Amount
Associate	DGJ	Daniella G. Heringer	0.60	335.00	\$201.00
Partner	JMR	Jason M Rudd	0.60	560.00	\$336.00
Associate	SDL	Scott D. Lawrence	2.80	420.00	\$1,176.00
			4.00		\$1,713.00

Required Notice to Clients.

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Federal Tax No: 45-4183914

July 6, 2020

Invoice No: 123582  
Our File No: 7066-23 JMR  
Billing through: 06/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Tax

TOTAL FEES	\$84.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$84.00
NET BALANCE FORWARD	\$0.00
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$84.00</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

**Wick Phillips Gould & Martin, LLP**

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Federal Tax ID: 45-4183914

July 6, 2020

Invoice No: 123582  
Our File No: 7066-23 JMR  
Billing through: 06/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Tax**

Balance forward as of invoice dated	\$0.00
Payments received since last invoice	\$0.00
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$0.00</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

06/24/2020	SDL	Correspondence with Trustee and review of form for requesting extension of income tax filing deadline.	0.20 hrs	420 /hr	84.00
Total fees for this matter			0.20 hrs		<u>84.00</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP For Professional Services Rendered	Page 1 Invoice No: 123582 Invoice through: 06/30/2020
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**BILLING SUMMARY**

TOTAL FEES	\$84.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	\$84.00
NET BALANCE FORWARD	\$0.00
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$84.00</div>

**Timekeeper Summary**

Name		Hours	Rate	Amount	
Associate	SDL	Scott D. Lawrence	0.20	420.00	\$84.00
			0.20		\$84.00

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Federal Tax No: 45-4183914

August 6, 2020

Invoice No: 124856  
Our File No: 7066-22 JMR  
Billing through: 07/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Reporting

TOTAL FEES	\$224.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$224.00
NET BALANCE FORWARD	\$1,365.50
TOTAL BALANCE NOW DUE	<div>\$1,589.50</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

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(214) 692-6255  
Federal Tax No. 45-4183914

August 6, 2020

Invoice No. 124856  
Reference No. 7066-22 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Reporting

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122442	06/22/2020	22	JMR	\$6,659.50	\$1,331.90
123570	07/06/2020	22	JMR	\$168.00	\$33.60
Total Outstanding Balance					\$1,365.50
Total Amount Due on this Invoice					\$224.00
Total Balance Now Due					\$1,589.50

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$0.00	\$1,365.50	\$0.00	\$0.00	\$0.00	\$1,365.50

Please remit payment within 30 days. Thank you!



Wick Phillips Gould & Martin, LLP

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Federal Tax ID: 45-4183914

August 6, 2020

Invoice No: 124856  
Our File No: 7066-22 JMR  
Billing through: 07/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

Reporting

Balance forward as of invoice dated 07/06/2020	\$6,827.50
Payments received since last invoice	\$5,462.00
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$1,365.50</u>
Trust balance carried forward	\$0.00

FOR PROFESSIONAL SERVICES RENDERED

07/18/2020	JMR	Review, finalize and file MOR (0.2)	0.20 hrs	560 /hr	112.00
07/27/2020	JMR	Approve notice of amended budget for filing (0.2)	0.20 hrs	560 /hr	112.00
Total fees for this matter			0.40 hrs		<u>224.00</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP	Page 1
For Professional Services Rendered	Invoice No: 124856
	Invoice through: 07/31/2020

**BILLING SUMMARY**

TOTAL FEES	\$224.00
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$224.00
NET BALANCE FORWARD	\$1,365.50
TOTAL BALANCE NOW DUE	\$1,589.50

**Timekeeper Summary**

Name	Hours	Rate	Amount
Partner JMR Jason M Rudd	0.40	560.00	\$224.00
	0.40		\$224.00

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Federal Tax No: 45-4183914

August 6, 2020

Invoice No: 124857  
Our File No: 7066-23 JMR  
Billing through: 07/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Tax

TOTAL FEES	\$126.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$126.00
NET BALANCE FORWARD	\$16.80
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$142.80</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

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Federal Tax No. 45-4183914

August 6, 2020

Invoice No. 124857  
Reference No. 7066-23 JMR

Greg Milligan  
Attn: Gregory S. Milligan

Tax

### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
123582	07/06/2020	23	JMR	\$84.00	\$16.80
Total Outstanding Balance					\$16.80
Total Amount Due on this Invoice					\$126.00
Total Balance Now Due					\$142.80

### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$0.00	\$16.80	\$0.00	\$0.00	\$0.00	\$16.80

Please remit payment within 30 days. Thank you!

**Wick Phillips Gould & Martin, LLP**

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(214) 692-6255  
Federal Tax ID: 45-4183914

August 6, 2020

Invoice No: 124857  
Our File No: 7066-23 JMR  
Billing through: 07/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Tax**

Balance forward as of invoice dated 07/06/2020	\$84.00
Payments received since last invoice	\$67.20
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$16.80</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

07/28/2020	SDL	Call with Trustee, E. White and M. Schiffgens regarding debtor's records and accounting matters.	0.30 hrs	420 /hr	126.00
Total fees for this matter			0.30 hrs		<u>126.00</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP	Page 1
For Professional Services Rendered	Invoice No: 124857
	Invoice through: 07/31/2020

**BILLING SUMMARY**

TOTAL FEES	\$126.00
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$126.00
NET BALANCE FORWARD	\$16.80
TOTAL BALANCE NOW DUE	\$142.80

**Timekeeper Summary**

Name		Hours	Rate	Amount	
Associate	SDL	Scott D. Lawrence	0.30	420.00	\$126.00
			0.30		\$126.00

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Federal Tax No: 45-4183914

August 6, 2020

Invoice No: 124858  
Our File No: 7066-20 JMR  
Billing through: 07/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Real Estate

TOTAL FEES	\$728.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$728.00
NET BALANCE FORWARD	\$201.60
TOTAL BALANCE NOW DUE	<div>\$929.60</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

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Federal Tax No. 45-4183914

August 6, 2020

Invoice No. 124858  
Reference No. 7066-20 JMR

Greg Milligan  
Attn: Gregory S. Milligan

Real Estate

### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122436	06/22/2020	20	JMR	\$1,008.00	\$201.60
Total Outstanding Balance					\$201.60
Total Amount Due on this Invoice					\$728.00
Total Balance Now Due					<u>\$929.60</u>

### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$0.00	\$201.60	\$0.00	\$0.00	\$0.00	\$201.60

Please remit payment within 30 days. Thank you!



Wick Phillips Gould & Martin, LLP

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Federal Tax ID: 45-4183914

August 6, 2020

Invoice No: 124858  
Our File No: 7066-20 JMR  
Billing through: 07/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

Real Estate

Balance forward as of invoice dated 06/22/2020	\$1,008.00
Payments received since last invoice	\$806.40
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$201.60</u>
Trust balance carried forward	\$0.00

FOR PROFESSIONAL SERVICES RENDERED

07/06/2020	JMR	Correspondence with Trustee and Gen. Contractor regarding environmental reports and history (0.2); telephone conference and correspondence with T. Scannell on same (0.3)	0.50 hrs	560 /hr	280.00
07/15/2020	JMR	Correspondence with A. Zarafshani and counsel regarding PDA and TxDOT related matters (.3); correspondence with G. Milligan on same (.2); correspondence with R. Horton on same (0.2)	0.70 hrs	560 /hr	392.00
07/19/2020	JMR	Correspondence on PDA related coordination and timing strategy (0.1)	0.10 hrs	560 /hr	56.00
Total fees for this matter			1.30 hrs		<u>728.00</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 1 Invoice No: 124858 Invoice through: 07/31/2020
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**BILLING SUMMARY**

TOTAL FEES	\$728.00
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$728.00
NET BALANCE FORWARD	\$201.60
TOTAL BALANCE NOW DUE	\$929.60

Timekeeper Summary

Name	Hours	Rate	Amount
Partner JMR Jason M Rudd	1.30	560.00	\$728.00
	1.30		\$728.00

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(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

August 6, 2020

Invoice No: 124859  
Our File No: 7066-19 JMR  
Billing through: 07/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Plan and Disclosure Statement

TOTAL FEES	\$18,111.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$18,111.00
NET BALANCE FORWARD	\$3,491.26
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$21,602.26</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

Wick Phillips Gould & Martin, LLP

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Dallas, TX 75204  
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(214) 692-6255  
Federal Tax No. 45-4183914

August 6, 2020

Invoice No. 124859  
Reference No. 7066-19 JMR

Greg Milligan  
Attn: Gregory S. Milligan

Plan and Disclosure Statement

Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122437	06/22/2020	19	JMR	\$7,586.50	\$1,517.06
123571	07/06/2020	19	JMR	\$9,871.00	\$1,974.20
Total Outstanding Balance					\$3,491.26
Total Amount Due on this Invoice					\$18,111.00
Total Balance Now Due					\$21,602.26

Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$0.00	\$3,491.26	\$0.00	\$0.00	\$0.00	\$3,491.26

Please remit payment within 30 days. Thank you!

**Wick Phillips Gould & Martin, LLP**

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Federal Tax ID: 45-4183914

August 6, 2020

Invoice No: 124859  
Our File No: 7066-19 JMR  
Billing through: 07/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Plan and Disclosure Statement**

Balance forward as of invoice dated 07/06/2020	\$17,457.50
Payments received since last invoice	\$13,966.24
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$3,491.26</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

07/02/2020	JMR	Telephone conference with T. Scannell regarding status of plan formulation and drafting, and related milestone and outstanding case issues (0.3); follow up correspondence on same (0.2)	0.50 hrs	560 /hr	280.00
07/07/2020	JMR	Analysis of claims for preservation in DS and related creditor recovery planning (0.4); correspondence with T. Scannell to advance plan negotiations (0.3)	0.70 hrs	560 /hr	392.00
07/08/2020	JMR	Portion of Trustee team call regarding status of plan negotiations and related milestones (0.3); telephone conference with T. Scannell on same (0.3); correspondence with trustee team (0.2); telephone conference with G. Milligan regarding plan preparations (0.2)	1.00 hrs	560 /hr	560.00
07/09/2020	JMR	Portion of Trustee team call regarding timing on plan and related negotiations (0.2)	0.20 hrs	560 /hr	112.00
07/14/2020	JMR	Correspondence with T. Scannell regarding advancing plan negotiations and drafting (0.2)	0.20 hrs	560 /hr	112.00
07/14/2020	NBN	Prepare for and attend call with Kell Mercer regarding case.	0.70 hrs	495 /hr	346.50
07/16/2020	JMR	Strategy conference with G. Milligan regarding mediation of class treatments (0.3)	0.30 hrs	560 /hr	168.00
07/21/2020	JMR	Strategy conference with Z. Mercer, T. Scannell and R. Horton regarding plan negotiations (0.8); correspondence on same with Trustee (0.3); correspondence with parties on follow up items (0.2)	1.30 hrs	560 /hr	728.00
07/22/2020	JMR	Analysis of mediation materials and related correspondence with the court on mediation and related schedule (0.3); correspondence with trustee	0.40 hrs	560 /hr	224.00

			Page		1
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP			Invoice No:		124859
For Professional Services Rendered			Invoice through:		07/31/2020
		on same (0.1)			
07/23/2020	JMR	Telephone conference with trustee team regarding planning for mediation (0.3); correspondence on collection of supporting materials for mediation statement (0.3); telephone conference with L. Clark and G. Milligan regarding mediation preparations (0.4); pre mediation coordination with N. Nelson (0.2)	1.20 hrs	560 /hr	672.00
07/23/2020	SDL	Call with Trustee, J. Rudd, N. Nelson, and E. White to discuss plan strategy and formulation.	0.50 hrs	420 /hr	210.00
07/24/2020	JMR	Telephone conference with T. Scannell on mediation and plan negotiation discussions (0.3); follow up correspondence on same (0.2); telephone conference with G. Milligan on same (0.2); correspondence with N. Nelson on planning for same (0.2)	0.90 hrs	560 /hr	504.00
07/24/2020	NBN	Prepare excerpt for mediation statement; correspond with J. Rudd regarding same.	1.10 hrs	495 /hr	544.50
07/27/2020	JMR	Draft mediation statement (2.8); portion of trustee team call on same (0.2); telephone conference with T. Scannell on removalables stipulation to advance mediation (0.2); correspondence with Trustee on comments to mediation statement (0.2); final revisions and update to mediation statement (0.4); correspondence with L. Clark on mediation statement and related correspondence among mediation participants on coordinating same (0.3)	4.10 hrs	560 /hr	2,296.00
07/27/2020	SDL	Review and revise mediation statement.	0.50 hrs	420 /hr	210.00
07/28/2020	JMR	Correspondence on mediation coordination and preparations (0.4)	0.40 hrs	560 /hr	224.00
07/29/2020	JMR	Correspondence with T. Scannell and L. Clark on mediation preparations (0.2); telephone conference with G. Milligan on strategy and preparation for same (0.4); preparations for mediation, including opening statement and related PPT (2.8)	3.40 hrs	560 /hr	1,904.00
07/29/2020	SDL	Review and revise slides for mediation and correspondence and call with J. Rudd regarding same.	0.60 hrs	420 /hr	252.00
07/30/2020	JMR	Strategy and preparation conference with Trustee team in advance of mediation (0.6); final revisions to mediation outline, presentation and materials (0.5); appear for and represent Trustee at plan mediation with Romspen, petitioning creditors and lien claimants (9.3)	10.40 hrs	560 /hr	5,824.00
07/30/2020	SDL	Call with Trustee, J. Rudd and E. White regarding preparation for mediation seeking global resolution of secured claims (.6); initial brief review of documents produced by Romspen and correspondence with Trustee, E. White and J. Rudd regarding same (.5); additional correspondences with group during and in support of mediation (.3).	1.40 hrs	420 /hr	588.00
07/31/2020	JMR	Strategy conference with G. Milligan and trustee team on post-mediation action items, including service on lien claimants, advancing plan settlement strategies and related issues (0.5); correspondence with K. Mercer on Summer Legacy representation	2.30 hrs	560 /hr	1,288.00

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP For Professional Services Rendered	Page Invoice No: Invoice through:	2 124859 07/31/2020
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	(0.1); correspondence with Panache team on mediation follow up questions (0.2); coordinate notice of further mediation with Trustee team on further M&M lien claimants (0.3); correspondence with Judge Clark and mediation party counsel on next steps post-mediation and related to 8/10 follow up schedule (0.4); finalize claim analysis to inform mediation discussions (0.6); correspondence with Judge Clark and mediation party counsel on same (0.2).				
07/31/2020	SDL	Call with Trustee, E. White and J. Rudd regarding secured and lien claimants and next steps regarding providing notice to same (.5); correspondence with E. White and J. Rudd regarding same (.2); draft proposed notice language for same (.2); review lien notices for additional contact information (.4); draft spreadsheet of continued mediation notice recipients (.3).	1.60 hrs	420 /hr	672.00
Total fees for this matter			33.70 hrs		18,111.00

**BILLING SUMMARY**

TOTAL FEES	\$18,111.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	\$18,111.00
NET BALANCE FORWARD	\$3,491.26
TOTAL BALANCE NOW DUE	\$21,602.26

**Timekeeper Summary**

Name		Hours	Rate	Amount
Partner	JMR Jason M Rudd	27.30	560.00	\$15,288.00
Partner	NBN Nick B. Nelson	1.80	495.00	\$891.00
Associate	SDL Scott D. Lawrence	4.60	420.00	\$1,932.00
		33.70		\$18,111.00

**Required Notice to Clients.**

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## Wick Phillips Gould & Martin, LLP

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(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

August 6, 2020

Invoice No: 124860  
Our File No: 7066-07 JMR  
Billing through: 07/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Budgeting (Case)

TOTAL FEES	\$66.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$66.00
NET BALANCE FORWARD	\$16.80
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$82.80</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!



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Federal Tax No. 45-4183914

August 6, 2020

Invoice No. 124860  
Reference No. 7066-07 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Budgeting (Case)

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122447	06/22/2020	07	JMR	\$84.00	\$16.80
Total Outstanding Balance					\$16.80
Total Amount Due on this Invoice					\$66.00
Total Balance Now Due					\$82.80

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$0.00	\$16.80	\$0.00	\$0.00	\$0.00	\$16.80

Please remit payment within 30 days. Thank you!

**Wick Phillips Gould & Martin, LLP**

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Federal Tax ID: 45-4183914

August 6, 2020

Invoice No: 124860  
Our File No: 7066-07 JMR  
Billing through: 07/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Budgeting (Case)**

Balance forward as of invoice dated 06/22/2020	\$84.00
Payments received since last invoice	\$67.20
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$16.80</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

07/27/2020	BR	Finalize notice of amended budget; file re same.	<u>0.40</u>	hrs	165	/hr	<u>66.00</u>
		Total fees for this matter	0.40	hrs			66.00

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page Invoice No: Invoice through:	1 124860 07/31/2020
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**BILLING SUMMARY**

TOTAL FEES	\$66.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	\$66.00
NET BALANCE FORWARD	\$16.80
TOTAL BALANCE NOW DUE	\$82.80

**Timekeeper Summary**

Name	Hours	Rate	Amount
Legal      BR      Brenda Ramirez	0.40	165.00	\$66.00
Assistant	0.40		\$66.00

**Required Notice to Clients.**

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Federal Tax No: 45-4183914

August 6, 2020

Invoice No: 124861  
Our File No: 7066-08 JMR  
Billing through: 07/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Business Operations

TOTAL FEES	\$5,152.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$5,152.00
NET BALANCE FORWARD	\$2,262.40
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$7,414.40</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP  
Please include invoice number on payment. Thank you!

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Federal Tax No. 45-4183914

August 6, 2020

Invoice No. 124861  
Reference No. 7066-08 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Business Operations

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122446	06/22/2020	08	JMR	\$5,026.00	\$1,005.20
123575	07/06/2020	08	JMR	\$6,286.00	\$1,257.20
Total Outstanding Balance					\$2,262.40
Total Amount Due on this Invoice					\$5,152.00
Total Balance Now Due					\$7,414.40

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$0.00	\$2,262.40	\$0.00	\$0.00	\$0.00	\$2,262.40

Please remit payment within 30 days. Thank you!

**Wick Phillips Gould & Martin, LLP**

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Federal Tax ID: 45-4183914

August 6, 2020

Invoice No: 124861  
Our File No: 7066-08 JMR  
Billing through: 07/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Business Operations**

Balance forward as of invoice dated 07/06/2020	\$11,312.00
Payments received since last invoice	\$9,049.60
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$2,262.40</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

07/01/2020	SDL	Call with Trustee, J. Rudd and E. White regarding updated proposed critical vendor treatment (.2); research forms of requests for additional funding and incorporate into new draft of motion and order (.8).	1.00 hrs	420 /hr	420.00
07/06/2020	JMR	Portion of Trustee team call and related correspondence on advancing sub work and payment on project and need for special projects on same (0.3)	0.30 hrs	560 /hr	168.00
07/06/2020	JMR	Analysis and correspondence with trustee team on vendor funding and payment matters (0.3); correspondence with D. Williamson on proposed vendor payments and related questions (0.2).	0.50 hrs	560 /hr	280.00
07/06/2020	SDL	Discuss motion to pay vendor costs with Trustee (.1); final review of prepetition vendor payment motion (.3); correspondence with B. Ramirez regarding same (.1); review correspondence from D. Williamson regarding same (.1); correspondence to J. Rudd regarding same (.1); multiple calls and correspondences regarding foundation work and conference with concrete and fill vendor's attorney, Trustee, and others related to same (1.3).	2.00 hrs	420 /hr	840.00
07/07/2020	SDL	Call with Trustee and M. O'Toole regarding status of negotiations with TxDOT (.5); review list of prepetition claims to be paid under motion to pay (.2); correspondence to counsel for D. White regarding confidentiality of same (.4); call with Trustee regarding same (.1); multiple calls and correspondences regarding foundation remediation	1.90 hrs	420 /hr	798.00

				Page	1
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP				Invoice No:	124861
For Professional Services Rendered				Invoice through:	07/31/2020
		materials supplier and associated contract and payment processes (.4); call with Trustee regarding same (.3).			
07/08/2020	SDL	Calls and correspondence to counsel for D. White regarding potential objections and resolutions related to motion to pay prepetition claims (1.2); correspondence with Trustee and J. Rudd regarding same (.5);	2.50 hrs	420 /hr	1,050.00
07/08/2020	SDL	Correspondence to J. Rudd regarding call with D. Williamson.	0.20 hrs	420 /hr	84.00
07/09/2020	JMR	Correspondence with subcontractors regarding ongoing work and related documentation (0.2)	0.20 hrs	560 /hr	112.00
07/09/2020	SDL	Call and correspondence with Trustee and D. Williamson regarding stipulation related to motion to pay (.8); correspondence with Trustee and J. Rudd regarding additional issues related to concrete and fill supplier for foundation work (.7).	1.50 hrs	420 /hr	630.00
07/10/2020	SDL	Finalize and send correspondence to concrete and fill supplier related to foundation remediation work (.2); follow up correspondence with Trustee related to motion to pay (.1).	0.30 hrs	420 /hr	126.00
07/14/2020	JMR	Trustee team call to address developments at property and coordination of same (0.3)	0.30 hrs	560 /hr	168.00
07/16/2020	JMR	Correspondence on preservation projections (0.2)	0.20 hrs	560 /hr	112.00
07/23/2020	JMR	Correspondence with A. Zarafshani on subcontractor issues (0.3)	0.30 hrs	560 /hr	168.00
07/24/2020	JMR	Correspondence on preservation projects and related issues with G. Milligan and Panache (0.2)	0.20 hrs	560 /hr	112.00
07/29/2020	SDL	Call with Trustee and E. White regarding motion to pay certain vendors (.1); correspondence with B. Ramirez regarding same (.1).	0.20 hrs	420 /hr	84.00
Total fees for this matter			11.60 hrs		5,152.00

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 2 Invoice No: 124861 Invoice through: 07/31/2020
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**BILLING SUMMARY**

TOTAL FEES	\$5,152.00
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$5,152.00
NET BALANCE FORWARD	\$2,262.40
TOTAL BALANCE NOW DUE	\$7,414.40

Timekeeper Summary

Name		Hours	Rate	Amount
Partner	JMR Jason M Rudd	2.00	560.00	\$1,120.00
Associate	SDL Scott D. Lawrence	9.60	420.00	\$4,032.00
		11.60		\$5,152.00

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Federal Tax No: 45-4183914

August 6, 2020

Invoice No: 124862  
Our File No: 7066-09 JMR  
Billing through: 07/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Case Administration

TOTAL FEES	\$108.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$108.00
NET BALANCE FORWARD	\$644.00
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$752.00</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

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Federal Tax No. 45-4183914

August 6, 2020

Invoice No. 124862  
Reference No. 7066-09 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Case Administration

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122445	06/22/2020	09	JMR	\$2,688.00	\$537.60
123576	07/06/2020	09	JMR	\$532.00	\$106.40
Total Outstanding Balance					\$644.00
Total Amount Due on this Invoice					\$108.00
Total Balance Now Due					\$752.00

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$0.00	\$644.00	\$0.00	\$0.00	\$0.00	\$644.00

Please remit payment within 30 days. Thank you!

Wick Phillips Gould & Martin, LLP

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August 6, 2020

Invoice No: 124862  
Our File No: 7066-09 JMR  
Billing through: 07/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

Case Administration

Balance forward as of invoice dated 07/06/2020	\$3,220.00
Payments received since last invoice	\$2,576.00
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$644.00</u>
Trust balance carried forward	\$0.00

FOR PROFESSIONAL SERVICES RENDERED

07/02/2020	BR	Prepare notice of change of address; file re same.	0.20 hrs	165 /hr	33.00
07/02/2020	SDL	Correspondence with Trustee and B. Ramirez regarding change of address for Harney Partners and review and revise same.	0.10 hrs	420 /hr	42.00
07/29/2020	BR	Finalize certificate of no objections; file re same.	0.10 hrs	165 /hr	16.50
07/31/2020	BR	Prepare certificate of no objection on application to employ.	0.10 hrs	165 /hr	16.50
Total fees for this matter			<u>0.50 hrs</u>		<u>108.00</u>

Greg Milligan as proposed ch 11 trustee of  
3443 Zen Garden LP  
For Professional Services Rendered

Page 1  
Invoice No: 124862  
Invoice through: 07/31/2020

**BILLING SUMMARY**

TOTAL FEES	\$108.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	\$108.00
NET BALANCE FORWARD	\$644.00
TOTAL BALANCE NOW DUE	\$752.00

**Timekeeper Summary**

Name			Hours	Rate	Amount
Legal Assistant	BR	Brenda Ramirez	0.40	165.00	\$66.00
Associate	SDL	Scott D. Lawrence	0.10	420.00	\$42.00
			0.50		\$108.00

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Federal Tax No: 45-4183914

August 6, 2020

Invoice No: 124863  
Our File No: 7066-03 JMR  
Billing through: 07/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Asset Analysis and Recovery

TOTAL FEES	\$1,066.00
TOTAL DISBURSEMENTS	\$31.85
TOTAL CHARGES FOR THIS BILL	<hr/> \$1,097.85
NET BALANCE FORWARD	\$3,456.90
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$4,554.75</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

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(214) 692-6255  
Federal Tax No. 45-4183914

August 6, 2020

Invoice No. 124863  
Reference No. 7066-03 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Asset Analysis and Recovery

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122449	06/22/2020	03	JMR	\$13,166.00	\$2,633.20
123572	07/06/2020	03	JMR	\$4,118.50	\$823.70
Total Outstanding Balance					\$3,456.90
Total Amount Due on this Invoice					\$1,097.85
Total Balance Now Due					\$4,554.75

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$0.00	\$3,456.90	\$0.00	\$0.00	\$0.00	\$3,456.90

Please remit payment within 30 days. Thank you!

Wick Phillips Gould & Martin, LLP

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Federal Tax ID: 45-4183914

August 6, 2020

Invoice No: 124863  
Our File No: 7066-03 JMR  
Billing through: 07/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

Asset Analysis and Recovery

Balance forward as of invoice dated 07/06/2020	\$17,284.50
Payments received since last invoice	\$13,827.60
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$3,456.90</u>
Trust balance carried forward	\$0.00

FOR PROFESSIONAL SERVICES RENDERED

07/01/2020	DGJ	Begin to analyze legal authorities re. payments lender directly paid to general contractor and whether said payments are considered preferences under the Bankruptcy Code (0.6)	0.60 hrs	335 /hr	201.00
07/03/2020	DGJ	Continue to analyze legal authorities re. payments lender directly paid to general contractor and whether said payments are considered preferences under the Bankruptcy Code (0.6)	0.20 hrs	335 /hr	67.00
07/05/2020	SDL	Begin research into removal deadlines related to receivership action and applicability of exception for lift of stay in certain circumstances.	0.80 hrs	420 /hr	336.00
07/06/2020	SDL	Finalize research into removal and applicability of stay to state court receivership proceeding and correspondence with J. Rudd regarding same.	1.10 hrs	420 /hr	462.00
Total fees for this matter			<u>2.70 hrs</u>		<u>1,066.00</u>

DISBURSEMENTS

07/31/2020	Thomson Reuters-West - Online research	31.85
Total disbursements for this matter		<u>\$31.85</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP For Professional Services Rendered	Page 1 Invoice No: 124863 Invoice through: 07/31/2020
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**BILLING SUMMARY**

TOTAL FEES	\$1,066.00
TOTAL DISBURSEMENTS	\$31.85
TOTAL CHARGES FOR THIS BILL	\$1,097.85
NET BALANCE FORWARD	\$3,456.90
TOTAL BALANCE NOW DUE	\$4,554.75

**Timekeeper Summary**

Name			Hours	Rate	Amount
Associate	DGJ	Daniella G. Heringer	0.80	335.00	\$268.00
Associate	SDL	Scott D. Lawrence	1.90	420.00	\$798.00
			2.70		\$1,066.00

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Federal Tax No: 45-4183914

August 6, 2020

Invoice No: 124864  
Our File No: 7066-01 JMR  
Billing through: 07/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: 3443 Zen Gardens Bankruptcy

TOTAL FEES	\$0.00
TOTAL DISBURSEMENTS	\$205.20
TOTAL CHARGES FOR THIS BILL	<hr/> \$205.20
NET BALANCE FORWARD	\$214.50
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$419.70</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP  
Please include invoice number on payment. Thank you!

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Federal Tax No. 45-4183914

August 6, 2020

Invoice No. 124864  
Reference No. 7066-01 JMR

Greg Milligan  
Attn: Gregory S. Milligan

3443 Zen Gardens Bankruptcy

### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122435	06/22/2020	01	JMR	\$972.96	\$214.50
Total Outstanding Balance					\$214.50
Total Amount Due on this Invoice					\$205.20
Total Balance Now Due					<u>\$419.70</u>

### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$0.00	\$214.50	\$0.00	\$0.00	\$0.00	\$214.50

Please remit payment within 30 days. Thank you!

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August 6, 2020

Invoice No: 124864  
Our File No: 7066-01 JMR  
Billing through: 07/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

3443 Zen Gardens Bankruptcy

Balance forward as of invoice dated 07/06/2020	\$2,568.48
Payments received since last invoice	\$2,353.98
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$214.50</u>
Trust balance carried forward	\$0.00

DISBURSEMENTS

07/06/2020	Bankruptcy copies (BR)	79.80
07/09/2020	Bankruptcy copies (BR)	68.40
07/31/2020	Postage	57.00
	Total disbursements for this matter	<u>\$205.20</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 1 Invoice No: 124864 Invoice through: 07/31/2020
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BILLING SUMMARY

TOTAL FEES	\$0.00
TOTAL DISBURSEMENTS	\$205.20
TOTAL CHARGES FOR THIS BILL	\$205.20
NET BALANCE FORWARD	\$214.50
TOTAL BALANCE NOW DUE	\$419.70

Required Notice to Clients.

THE STATE BAR OF TEXAS INVESTIGATES AND PROSECUTES PROFESSIONAL MISCONDUCT COMMITTED BY TEXAS ATTORNEYS. ALTHOUGH NOT EVERY COMPLAINT AGAINST OR DISPUTE WITH A LAWYER INVOLVES PROFESSIONAL MISCONDUCT, THE STATE BAR'S OFFICE OR GENERAL COUNSEL WILL PROVIDE YOU WITH INFORMATION ABOUT HOW TO FILE A COMPLAINT. PLEASE CALL 1-800-932-1900 TOLL-FREE FOR MORE INFORMATION.

## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200 phone  
(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

August 6, 2020

Invoice No: 124865  
Our File No: 7066-25 JMR  
Billing through: 07/31/2020

Greg Milligan  
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden, LP  
Email to: gmilligan@harneypartners.com

### Matter Summary

RE: Challenge Investigation

TOTAL FEES	\$12,407.50
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$12,407.50
NET BALANCE FORWARD	\$4,081.90
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$16,489.40</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP  
Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax No. 45-4183914

August 6, 2020

Invoice No. 124865  
Reference No. 7066-25 JMR

Greg Milligan  
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden, LP  
Email to: gmilligan@harneypartners.com

### Challenge Investigation

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122451	06/22/2020	25	JMR	\$3,021.50	\$603.20
123569	07/06/2020	25	JMR	\$17,393.50	\$3,478.70
Total Outstanding Balance					\$4,081.90
Total Amount Due on this Invoice					\$12,407.50
Total Balance Now Due					\$16,489.40

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$0.00	\$4,081.90	\$0.00	\$0.00	\$0.00	\$4,081.90

Please remit payment within 30 days. Thank you!

**Wick Phillips Gould & Martin, LLP**

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

August 6, 2020

Invoice No: 124865  
Our File No: 7066-25 JMR  
Billing through: 07/31/2020

Greg Milligan  
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden, LP  
Email to: gmilligan@harneypartners.com

**Challenge Investigation**

Balance forward as of invoice dated 07/06/2020	\$20,415.00
Payments received since last invoice	\$16,333.10
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$4,081.90</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

07/01/2020	DGJ	Review all pleadings in lawsuit against Rompsen (1.0); prepare memo analyzing possible claims against Rompsen (2.2)	3.20 hrs	335 /hr	1,072.00
07/01/2020	JMR	Analysis conference with N. Nelson and G. Milligan regarding update and next steps on claim analysis and investigation (0.5); telephone conference with M. Bailey on conclusions as to lien and loan analysis (0.4); correspondence with N. Nelson on specific claim investigation items including file requests (0.2)	1.10 hrs	560 /hr	616.00
07/01/2020	MWB	Correspondence regarding loan memo; telephone conference regarding the same.	1.40 hrs	545 /hr	763.00
07/01/2020	SDL	Call with N. Nelson, Trustee, J. Rudd and E. White to discuss progress and status of challenge investigation (.8); research into deadline for removal of actions	0.80 hrs	420 /hr	336.00
07/02/2020	NBN	Prepare memorandum; review documents provided by client and third parties.	2.50 hrs	495 /hr	1,237.50
07/03/2020	NBN	Review documents provided by Zen Garden and other parties; prepare memorandum; correspond with client regarding same.	5.50 hrs	495 /hr	2,722.50
07/07/2020	NBN	Attend call with Trustee regarding status of investigation; prepare list of additional documents needed from Rompsen; coordinate request for same.	0.80 hrs	495 /hr	396.00
07/09/2020	NBN	Prepare for and attend call with Hinshaw; send summary of same to client and J. Rudd.	1.90 hrs	495 /hr	940.50
07/10/2020	MWB	Prepare and revise memorandum regarding	3.20 hrs	545 /hr	1,744.00

			Page		1
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP			Invoice No:		124865
For Professional Services Rendered			Invoice through:		07/31/2020
		secured financing.			
07/10/2020	NBN	Correspond with counsel for Dan White regarding consent to release of documents; correspond with A. Zarafshani to obtain consent for release of documents from prior counsel.	0.60 hrs	495 /hr	297.00
07/14/2020	MWB	Draft and revise memorandum regarding loan documents and perfection of liens.	0.50 hrs	545 /hr	N/C
07/15/2020	NBN	Correspond with D. Richardson regarding request for documents.	0.30 hrs	495 /hr	148.50
07/16/2020	MWB	Revise memorandum regarding financing issues; correspondence regarding the same.	2.10 hrs	545 /hr	1,144.50
07/23/2020	NBN	Draft correspondence to Hinshaw regarding need to turn over privileged documents; attend trustee call.	0.80 hrs	495 /hr	396.00
07/24/2020	NBN	Attend call with trustee; prepare letter to Rompsen counsel demanding production of documents; correspond with client regarding same.	1.20 hrs	495 /hr	594.00
07/27/2020	BR	Finalize notice and stipulation extending removables challenge deadlines.	0.40 hrs	165 /hr	N/C
Total fees for this matter			26.30 hrs		12,407.50



Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 2 Invoice No: 124865 Invoice through: 07/31/2020
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**BILLING SUMMARY**

TOTAL FEES	\$12,407.50
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$12,407.50
NET BALANCE FORWARD	\$4,081.90
TOTAL BALANCE NOW DUE	\$16,489.40

**Timekeeper Summary**

Name			Hours	Rate	Amount
Legal Assistant	BR	Brenda Ramirez	0.40	0.00	\$0.00
Associate	DGJ	Daniella G. Heringer	3.20	335.00	\$1,072.00
Partner	JMR	Jason M Rudd	1.10	560.00	\$616.00
Partner	MWB	Michael W Bailey	0.50	0.00	\$0.00
Partner	MWB	Michael W Bailey	6.70	545.00	\$3,651.50
Partner	NBN	Nick B. Nelson	13.60	495.00	\$6,732.00
Associate	SDL	Scott D. Lawrence	0.80	420.00	\$336.00
			26.30		\$12,407.50

**Required Notice to Clients.**

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(214) 692-6200 phone  
(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

August 6, 2020

Invoice No: 124866  
Our File No: 7066-04 JMR  
Billing through: 07/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Asset Disposition

TOTAL FEES	\$7,938.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$7,938.00
NET BALANCE FORWARD	\$2,267.20
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$10,205.20</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
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(214) 692-6200  
(214) 692-6255  
Federal Tax No. 45-4183914

August 6, 2020

Invoice No. 124866  
Reference No. 7066-04 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Asset Disposition

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122448	06/22/2020	04	JMR	\$3,370.00	\$674.00
123574	07/06/2020	04	JMR	\$7,966.00	\$1,593.20
Total Outstanding Balance					\$2,267.20
Total Amount Due on this Invoice					\$7,938.00
Total Balance Now Due					\$10,205.20

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$0.00	\$2,267.20	\$0.00	\$0.00	\$0.00	\$2,267.20

Please remit payment within 30 days. Thank you!

**Wick Phillips Gould & Martin, LLP**

3131 McKinney Avenue  
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(214) 692-6255  
Federal Tax ID: 45-4183914

August 6, 2020

Invoice No: 124866  
Our File No: 7066-04 JMR  
Billing through: 07/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Asset Disposition**

Balance forward as of invoice dated 07/06/2020	\$11,336.00
Payments received since last invoice	\$9,068.80
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$2,267.20</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

07/01/2020	SDL	Call with Trustee and J. Rudd regarding marketing process (.1); review draft offering memorandum (.5); correspondence to Trustee and J. Rudd regarding same (.3); prepare for and attend call with Trustee, A. Zarafshani, and T. Mills regarding draft offering memorandum (.8); follow up call with Trustee regarding same (.2).	1.90 hrs	420 /hr	798.00
07/02/2020	SDL	Review of broker's proposed confidentiality agreement (.2); call with Trustee to discuss same (.1); continue revisions to bid procedures motion (.8); additional correspondence with Trustee and broker regarding marketing process (.2);	1.10 hrs	420 /hr	462.00
07/06/2020	JMR	Correspondence with broker and Trustee team on marketing process and kick off and related review of broker materials to launch same (0.6)	0.60 hrs	560 /hr	336.00
07/06/2020	SDL	Review marketing materials (.1); review confidentiality agreements with potential purchasers and correspondence with Trustee regarding same (.9); correspondences with T. Mills regarding same (.2);	1.20 hrs	420 /hr	504.00
07/07/2020	SDL	Finalize and circulate bid procedures motion and timelines related to same (1.3); call with Trustee, J. Rudd and E. White regarding same (.2); call with Trustee and Broker regarding same (.8); follow up correspondence regarding property condition assessment (.2);	2.50 hrs	420 /hr	1,050.00
07/08/2020	SDL	Work on bid procedures and review other forms of motion for bid procedures to incorporate streamlined procedures.	0.60 hrs	420 /hr	252.00

			Page		1
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered			Invoice No:		124866
			Invoice through:		07/31/2020
07/09/2020	SDL	Call with Trustee and J. Rudd to discuss bid procedures and marketing process (.3); Call to U.S. Trustee's office regarding treatment of PCA (.1); review and analyze form of CA proposed by potential purchaser and correspondence to Trustee and T. Mills regarding same (1.2).	1.60 hrs	420 /hr	672.00
07/10/2020	SDL	Call to U.S. Trustee to confer regarding treatment of PCA expense (.1); review agreement related to same and report to Trustee (.9); additional correspondence with Trustee regarding confidentiality agreements from potential purchasers (.8);	1.80 hrs	420 /hr	756.00
07/14/2020	SDL	Call with Trustee, J. Rudd and E. White regarding marketing process (.2); correspondence regarding same (.1); continue work on and revisions to bid procedures motion and attachments (1.6).	1.90 hrs	420 /hr	798.00
07/15/2020	SDL	Finalize and circulate draft of bid procedures motion, bid procedures, and order granting same (4.2); review revised proposed confidentiality agreement from potential purchaser and correspondence to Trustee regarding same (.2); call with potential purchaser regarding same (.1); follow up correspondence with Trustee regarding same (.1).	4.60 hrs	420 /hr	1,932.00
07/17/2020	SDL	Calls and correspondence with Trustee, T. Mills and J. Rudd regarding bid procedures, marketing process, and order granting broker retention application (.2); finalize order granting broker retention and correspondence related to same (.2).	0.40 hrs	420 /hr	168.00
07/22/2020	SDL	Review mark up of confidentiality agreement and correspondence to Trustee regarding same.	0.50 hrs	420 /hr	210.00
Total fees for this matter			18.70 hrs		7,938.00

Greg Milligan as proposed ch 11 trustee of  
3443 Zen Garden LP  
For Professional Services Rendered

Page 2  
Invoice No: 124866  
Invoice through: 07/31/2020

BILLING SUMMARY

TOTAL FEES	\$7,938.00
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$7,938.00
NET BALANCE FORWARD	\$2,267.20
TOTAL BALANCE NOW DUE	\$10,205.20

Timekeeper Summary

Name			Hours	Rate	Amount
Partner	JMR	Jason M Rudd	0.60	560.00	\$336.00
Associate	SDL	Scott D. Lawrence	18.10	420.00	\$7,602.00
			18.70		\$7,938.00

Required Notice to Clients.

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Dallas, TX 75204  
(214) 692-6200 phone  
(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

August 6, 2020

Invoice No: 124867  
Our File No: 7066-10 JMR  
Billing through: 07/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Claims Administration and Objections

TOTAL FEES	\$280.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$280.00
NET BALANCE FORWARD	\$468.60
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$748.60</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP  
Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax No. 45-4183914

August 6, 2020

Invoice No. 124867  
Reference No. 7066-10 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Claims Administration and Objections

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122444	06/22/2020	10	JMR	\$630.00	\$126.00
123581	07/06/2020	10	JMR	\$1,713.00	\$342.60
Total Outstanding Balance					\$468.60
Total Amount Due on this Invoice					\$280.00
Total Balance Now Due					\$748.60

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$0.00	\$468.60	\$0.00	\$0.00	\$0.00	\$468.60

Please remit payment within 30 days. Thank you!



**Wick Phillips Gould & Martin, LLP**

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

August 6, 2020

Invoice No: 124867  
Our File No: 7066-10 JMR  
Billing through: 07/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Claims Administration and Objections**

Balance forward as of invoice dated 07/06/2020	\$2,343.00
Payments received since last invoice	\$1,874.40
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$468.60</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

07/07/2020	JMR	Portion of Trustee team call on prepetition claim process for critical vendors (0.3); correspondence with D. Williamson on same (0.2)	0.50 hrs	560 /hr	280.00
Total fees for this matter			<u>0.50 hrs</u>		<u>280.00</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 1 Invoice No: 124867 Invoice through: 07/31/2020
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**BILLING SUMMARY**

TOTAL FEES	\$280.00
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$280.00
NET BALANCE FORWARD	\$468.60
TOTAL BALANCE NOW DUE	\$748.60

**Timekeeper Summary**

Name	Hours	Rate	Amount
Partner JMR Jason M Rudd	0.50	560.00	\$280.00
	0.50		\$280.00

**Required Notice to Clients.**

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Federal Tax No: 45-4183914

August 6, 2020

Invoice No: 124868  
Our File No: 7066-13 JMR  
Billing through: 07/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Employment and Fee Applications

TOTAL FEES	\$4,137.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$4,137.00
NET BALANCE FORWARD	\$11,210.74
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$15,347.74</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax No. 45-4183914

August 6, 2020

Invoice No. 124868  
Reference No. 7066-13 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Employment and Fee Applications

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122443	06/22/2020	13	JMR	\$23,797.72	\$4,759.54
123578	07/06/2020	13	JMR	\$32,256.00	\$6,451.20
Total Outstanding Balance					\$11,210.74
Total Amount Due on this Invoice					\$4,137.00
Total Balance Now Due					\$15,347.74

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$0.00	\$11,210.74	\$0.00	\$0.00	\$0.00	\$11,210.74

Please remit payment within 30 days. Thank you!

**Wick Phillips Gould & Martin, LLP**

3131 McKinney Avenue  
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(214) 692-6255  
Federal Tax ID: 45-4183914

August 6, 2020

Invoice No: 124868  
Our File No: 7066-13 JMR  
Billing through: 07/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Employment and Fee Applications**

Balance forward as of invoice dated 07/06/2020	\$56,053.72
Payments received since last invoice	\$44,842.98
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$11,210.74</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

07/01/2020	SDL	Mark up engagement letter for conversation with proposed accountant (.4); update list of parties in interest for proposed accountant (.2); call and correspondence with proposed accountant to prepare revisions to retention application (.9); follow up correspondence to Trustee (.3).	1.80 hrs	420 /hr	756.00
07/02/2020	SDL	Call and correspondence with Trustee, J. Rudd and E. White regarding accountant retention (.4); revisions to accountant retention application and circulate same to Trustee for review (1.5).	1.90 hrs	420 /hr	798.00
07/06/2020	SDL	Correspondence with Trustee regarding initial fee statement payment deadlines (.1); revisions to application to retain accountant and correspondence with M. Schiffgens regarding same and request for updated engagement letter (1.5).	1.60 hrs	420 /hr	672.00
07/07/2020	SDL	Correspondences with T. Irion regarding fee statements for June and wire instructions for prior payments (.2); review of fee statement from Sprouse Shrader Smith for period ending May 31 (.2); call with M. Schiffgens and revisions to declaration in support of application to retain accountant (.8); finalize and circulate application to retain accountant (.8);	2.00 hrs	420 /hr	840.00
07/08/2020	SDL	Correspondence with Trustee and accountant regarding further revisions to engagement letter (.3); finalize and serve June fee statements (.7);	1.00 hrs	420 /hr	420.00
07/09/2020	BR	Finalize application to employ accountant; file and serve re same.	1.40 hrs	165 /hr	231.00
07/09/2020	SDL	Call with Trustee to discuss revisions to application	0.50 hrs	420 /hr	210.00

				Page	1
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP				Invoice No:	124868
For Professional Services Rendered				Invoice through:	07/31/2020
<hr/>					
		(.1); Finalize application to retain accountant and correspondence with B. Ramirez regarding same.			
07/16/2020	SDL	Correspondence with T. Scannell regarding holdover period for broker.	0.20 hrs	420 /hr	84.00
07/21/2020	SDL	Correspondence to Trustee regarding end of time to object to June fee statements and payment of same.	0.10 hrs	420 /hr	42.00
07/28/2020	SDL	Correspondence to court regarding Cushman & Wakefield application and contact information.	0.20 hrs	420 /hr	84.00
Total fees for this matter			10.70 hrs		4,137.00

BILLING SUMMARY

TOTAL FEES	\$4,137.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	\$4,137.00
NET BALANCE FORWARD	\$11,210.74
TOTAL BALANCE NOW DUE	\$15,347.74

Timekeeper Summary

Name			Hours	Rate	Amount
Legal Assistant	BR	Brenda Ramirez	1.40	165.00	\$231.00
Associate	SDL	Scott D. Lawrence	9.30	420.00	\$3,906.00
			10.70		\$4,137.00

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Federal Tax No: 45-4183914

August 6, 2020

Invoice No: 124869  
Our File No: 7066-14 JMR  
Billing through: 07/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Employment and Fee Application Objections

TOTAL FEES	\$336.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$336.00
NET BALANCE FORWARD	\$168.00
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$504.00</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

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(214) 692-6200  
(214) 692-6255  
Federal Tax No. 45-4183914

August 6, 2020

Invoice No. 124869  
Reference No. 7066-14 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Employment and Fee Application Objections

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
123579	07/06/2020	14	JMR	\$840.00	\$168.00
Total Outstanding Balance					\$168.00
Total Amount Due on this Invoice					\$336.00
Total Balance Now Due					\$504.00

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$0.00	\$168.00	\$0.00	\$0.00	\$0.00	\$168.00

Please remit payment within 30 days. Thank you!



**Wick Phillips Gould & Martin, LLP**

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(214) 692-6255  
Federal Tax ID: 45-4183914

August 6, 2020

Invoice No: 124869  
Our File No: 7066-14 JMR  
Billing through: 07/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Employment and Fee Application Objections**

Balance forward as of invoice dated 07/06/2020	\$840.00
Payments received since last invoice	\$672.00
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$168.00</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

07/16/2020	JMR	Correspondence with T. Scannell and C&W regarding resolution of objections on same (0.4); telephone conference with G. Milligan on same (0.2)	0.60 hrs	560 /hr	336.00
Total fees for this matter			0.60 hrs		<u>336.00</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP For Professional Services Rendered	Page 1 Invoice No: 124869 Invoice through: 07/31/2020
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BILLING SUMMARY

TOTAL FEES	\$336.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	\$336.00
NET BALANCE FORWARD	\$168.00
TOTAL BALANCE NOW DUE	\$504.00

Timekeeper Summary

Name	Hours	Rate	Amount
Partner JMR Jason M Rudd	0.60	560.00	\$336.00
	0.60		\$336.00

Required Notice to Clients.

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## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200 phone  
(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

August 6, 2020

Invoice No: 124870  
Our File No: 7066-15 JMR  
Billing through: 07/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Financing and Cash Collateral

TOTAL FEES	\$7,387.50
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$7,387.50
NET BALANCE FORWARD	\$17,284.80
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$24,672.30</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP  
Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax No. 45-4183914

August 6, 2020

Invoice No. 124870  
Reference No. 7066-15 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Financing and Cash Collateral

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122441	06/22/2020	15	JMR	\$52,173.50	\$10,434.70
123580	07/06/2020	15	JMR	\$34,250.50	\$6,850.10
Total Outstanding Balance					\$17,284.80
Total Amount Due on this Invoice					\$7,387.50
Total Balance Now Due					<u>\$24,672.30</u>

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$0.00	\$17,284.80	\$0.00	\$0.00	\$0.00	\$17,284.80

Please remit payment within 30 days. Thank you!

**Wick Phillips Gould & Martin, LLP**

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

August 6, 2020

Invoice No: 124870  
Our File No: 7066-15 JMR  
Billing through: 07/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Financing and Cash Collateral**

Balance forward as of invoice dated 07/06/2020	\$86,424.00
Payments received since last invoice	\$69,139.20
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$17,284.80</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

07/06/2020	BR	Finalize motion to pay; file and serve re same.	1.20 hrs	165 /hr	198.00
07/06/2020	JMR	Correspondence with T. Scannell and G. Milligan regarding maintenance project budget items	0.30 hrs	560 /hr	168.00
07/09/2020	DGJ	Draft stipulation to waive deadlines in DIP Order. (0.4)	0.40 hrs	335 /hr	134.00
07/09/2020	JMR	Correspondence on advancing revised final DIP budget for August (0.2); portion of trustee call on same (0.2)	0.40 hrs	560 /hr	224.00
07/09/2020	SDL	Correspondence with D. Heringer regarding stipulation waiving DIP Order deadline.	0.10 hrs	420 /hr	42.00
07/10/2020	DGJ	Review and revise stipulation to waive the deadline.	0.50 hrs	335 /hr	167.50
07/10/2020	SDL	Review and correspondence to D. Heringer and J. Rudd regarding waiver of challenge period deadline.	0.20 hrs	420 /hr	84.00
07/14/2020	JMR	Telephone conference with Trustee team to address amended budget (0.3)	0.30 hrs	560 /hr	168.00
07/15/2020	JMR	Revise and update draft stipulation to extend challenge period (0.3); correspondence with K. Mercer and D. Williamson on same (0.4); correspondence with T. Scannell on same (0.3);	1.00 hrs	560 /hr	560.00
07/15/2020	SDL	Correspondence to B. Ramirez, Trustee, J. Rudd, & E. White regarding deadlines in financing order (.5); finalize notice of extension (.2).	0.70 hrs	420 /hr	294.00
07/16/2020	JMR	Analysis and revision to amended Aug. DIP budget and related items (0.7); correspondence with E. White and G. Milligan on same (0.2)	0.90 hrs	560 /hr	504.00
07/16/2020	SDL	Review proposed budget.	0.20 hrs	420 /hr	84.00
07/17/2020	JMR	Analysis of proposed revised Final August Cash	1.20 hrs	560 /hr	672.00

		Page		1	
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP		Invoice No:		124870	
For Professional Services Rendered		Invoice through:		07/31/2020	
	Collateral and Financing Budget (0.4); correspondence with Trustee team on same (0.4); correspondence with T. Scannell on submission and advancing approval of same (0.4)				
07/18/2020	JMR	Assessment or report from trustee and draft correspondence to T.Scannell with additional budget requests on repair and protection related work items (0.3); correspondence with Trustee on same (0.2)	0.50 hrs	560 /hr	280.00
07/20/2020	JMR	Telephone conference with G. Milligan regarding advancing budget approval and related financing order items (0.3); correspondence with T. Scannell in response to questions on same (0.5)	0.80 hrs	560 /hr	448.00
07/23/2020	JMR	Correspondence with T. Scannell and Trustee on advance budget approval and related issues (0.3); correspondence on funding timing under Financing Order (0.2); analysis of variance report (0.2); correspondence on advancing funding discussions with Romspen (0.3)	1.00 hrs	560 /hr	560.00
07/24/2020	JMR	Telephone conference with Romspen and Trustee legal and client teams to resolve approval of final amended August Budget, address related questions and issues (0.5); correspondence with Trustee team on results and next steps (0.3); finalize and serve budget reconciliation (0.3)	1.10 hrs	560 /hr	616.00
07/24/2020	SDL	Draft notice of amended final budget and correspondence with J. Rudd regarding same.	0.40 hrs	420 /hr	168.00
07/27/2020	SDL	Revisions and correspondence related to finalizing notice of amended budget (.4); review correspondence from counsel for D. White regarding same (.1); multiple correspondences and revisions to notice of stipulated revisions to scheduling order related to removables (.7); revise and finalize agreed motion to extend removables deadline (.8).	2.00 hrs	420 /hr	840.00
07/28/2020	JMR	Telephone conference with D. White counsel regarding amended August budget questions (0.5); correspondence with Trustee on same (0.1)	0.60 hrs	560 /hr	336.00
07/28/2020	SDL	Call with D. Rushing and J. Rudd regarding proposed budget (.5); follow up correspondences to gather information to respond to questions raised in call (.3).	0.80 hrs	420 /hr	336.00
07/29/2020	JMR	Correspondence with E. White and T. Scannell regarding budget funding for WE 7-Aug (0.2)	0.20 hrs	560 /hr	112.00
07/29/2020	SDL	Call with Trustee and E. White regarding proposed budget and response to D. Rushing related to same (.3); multiple correspondences regarding same (.5).	0.80 hrs	420 /hr	336.00
07/30/2020	JMR	Correspondence on budget approval and Romspen funding (0.1)	0.10 hrs	560 /hr	56.00
Total fees for this matter			15.70 hrs		7,387.50

Greg Milligan as proposed ch 11 trustee of  
3443 Zen Garden LP  
For Professional Services Rendered

Page 2  
Invoice No: 124870  
Invoice through: 07/31/2020

**BILLING SUMMARY**

TOTAL FEES	\$7,387.50
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	\$7,387.50
NET BALANCE FORWARD	\$17,284.80
TOTAL BALANCE NOW DUE	\$24,672.30

**Timekeeper Summary**

Name			Hours	Rate	Amount
Legal Assistant	BR	Brenda Ramirez	1.20	165.00	\$198.00
Associate	DGJ	Daniella G. Heringer	0.90	335.00	\$301.50
Partner	JMR	Jason M Rudd	8.40	560.00	\$4,704.00
Associate	SDL	Scott D. Lawrence	5.20	420.00	\$2,184.00
			15.70		\$7,387.50

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## Wick Phillips Gould & Martin, LLP

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(214) 692-6200 phone  
(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

August 6, 2020

Invoice No: 124871  
Our File No: 7066-17 JMR  
Billing through: 07/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Meetings and Communications with Creditors

TOTAL FEES	\$770.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$770.00
NET BALANCE FORWARD	\$658.00
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$1,428.00</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP  
Please include invoice number on payment. Thank you!



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Federal Tax No. 45-4183914

August 6, 2020

Invoice No. 124871  
Reference No. 7066-17 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Meetings and Communications with Creditors

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122439	06/22/2020	17	JMR	\$2,072.00	\$414.40
123573	07/06/2020	17	JMR	\$1,218.00	\$243.60
Total Outstanding Balance					\$658.00
Total Amount Due on this Invoice					\$770.00
Total Balance Now Due					\$1,428.00

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$0.00	\$658.00	\$0.00	\$0.00	\$0.00	\$658.00

Please remit payment within 30 days. Thank you!

**Wick Phillips Gould & Martin, LLP**

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(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

August 6, 2020

Invoice No: 124871  
Our File No: 7066-17 JMR  
Billing through: 07/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Meetings and Communications with Creditors**

Balance forward as of invoice dated 07/06/2020	\$3,290.00
Payments received since last invoice	\$2,632.00
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$658.00</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

07/03/2020	SDL	Calls and correspondence with B. Duke and J. Rudd regarding D. White.	0.30 hrs	420 /hr	126.00
07/14/2020	JMR	Telephone conference with K. Mercer on status of plan negotiations and related case milestones (0.3)	0.30 hrs	560 /hr	168.00
07/16/2020	JMR	Strategy conference with R. Horton regarding Panache related coordination and claim matters (0.3); telephone conference with G. Milligan on same (0.2)	0.50 hrs	560 /hr	280.00
07/27/2020	JMR	Correspondence with T. Scannell regarding approval and filing of stipulation on removables and other lien issues (0.2)	0.20 hrs	560 /hr	112.00
07/31/2020	SDL	Call and correspondence regarding inquiries from attorney for lien claimant.	0.20 hrs	420 /hr	84.00
Total fees for this matter			<u>1.50 hrs</u>		<u>770.00</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 1 Invoice No: 124871 Invoice through: 07/31/2020
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**BILLING SUMMARY**

TOTAL FEES	\$770.00
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$770.00
NET BALANCE FORWARD	\$658.00
TOTAL BALANCE NOW DUE	\$1,428.00

**Timekeeper Summary**

Name		Hours	Rate	Amount
Partner	JMR Jason M Rudd	1.00	560.00	\$560.00
Associate	SDL Scott D. Lawrence	0.50	420.00	\$210.00
		1.50		\$770.00

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Federal Tax No: 45-4183914

August 6, 2020

Invoice No: 124872  
Our File No: 7066-18 JMR  
Billing through: 07/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Non-Working Travel

TOTAL FEES	\$1,008.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$1,008.00
NET BALANCE FORWARD	\$0.00
TOTAL BALANCE NOW DUE	<div>\$1,008.00</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP  
Please include invoice number on payment. Thank you!

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Federal Tax ID: 45-4183914

August 6, 2020

Invoice No: 124872  
Our File No: 7066-18 JMR  
Billing through: 07/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

Non-Working Travel

Balance forward as of invoice dated	\$0.00
Payments received since last invoice	\$0.00
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$0.00</u>
Trust balance carried forward	\$0.00

FOR PROFESSIONAL SERVICES RENDERED

04/24/2020	JMR	Non-working travel from Dallas to Austin for meeting to secure and transfer property (1.6, billed at 1/2 time = 0.8); Return travel to Dallas (2.0 billed at 1/2 time = 1.0)	1.80 hrs	560 /hr	1,008.00
Total fees for this matter			<u>1.80 hrs</u>		<u>1,008.00</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 1 Invoice No: 124872 Invoice through: 07/31/2020
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**BILLING SUMMARY**

TOTAL FEES	\$1,008.00
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$1,008.00
NET BALANCE FORWARD	\$0.00
TOTAL BALANCE NOW DUE	\$1,008.00

**Timekeeper Summary**

Name	Hours	Rate	Amount
Partner JMR Jason M Rudd	1.80	560.00	\$1,008.00
	1.80		\$1,008.00

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Federal Tax No: 45-4183914

August 6, 2020

Invoice No: 124873  
Our File No: 7066-05 JMR  
Billing through: 07/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Assumption and Rejection of Leases and Contracts

TOTAL FEES	\$42.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$42.00
NET BALANCE FORWARD	\$0.00
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$42.00</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

**Wick Phillips Gould & Martin, LLP**

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(214) 692-6255  
Federal Tax ID: 45-4183914

August 6, 2020

Invoice No: 124873  
Our File No: 7066-05 JMR  
Billing through: 07/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Assumption and Rejection of Leases and Contracts**

Balance forward as of invoice dated	\$0.00
Payments received since last invoice	\$0.00
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$0.00</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

07/07/2020	SDL	Call with Trustee, J. Rudd and E. White regarding assumption and rejection deadline and discussion of relevance to case.	0.10 hrs	420 /hr	42.00
Total fees for this matter			<u>0.10 hrs</u>		<u>42.00</u>



Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP	Page 1
For Professional Services Rendered	Invoice No: 124873
	Invoice through: 07/31/2020

**BILLING SUMMARY**

TOTAL FEES	\$42.00
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$42.00
NET BALANCE FORWARD	\$0.00
TOTAL BALANCE NOW DUE	\$42.00

**Timekeeper Summary**

Name		Hours	Rate	Amount	
Associate	SDL	Scott D. Lawrence	0.10	420.00	\$42.00
			0.10		\$42.00

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Federal Tax No: 45-4183914

September 3, 2020

Invoice No: 126125  
Our File No: 7066-15 JMR  
Billing through: 08/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Financing and Cash Collateral

TOTAL FEES	\$9,171.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$9,171.00
NET BALANCE FORWARD	\$18,762.30
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$27,933.30</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

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(214) 692-6255  
Federal Tax No. 45-4183914

September 3, 2020

Invoice No. 126125  
Reference No. 7066-15 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Financing and Cash Collateral

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122441	06/22/2020	15	JMR	\$52,173.50	\$10,434.70
123580	07/06/2020	15	JMR	\$34,250.50	\$6,850.10
124870	08/06/2020	15	JMR	\$7,387.50	\$1,477.50
Total Outstanding Balance					\$18,762.30
Total Amount Due on this Invoice					\$9,171.00
Total Balance Now Due					\$27,933.30

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$1,477.50	\$6,850.10	\$10,434.70	\$0.00	\$0.00	\$18,762.30

Please remit payment within 30 days. Thank you!

**Wick Phillips Gould & Martin, LLP**

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(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

September 3, 2020

Invoice No: 126125  
Our File No: 7066-15 JMR  
Billing through: 08/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Financing and Cash Collateral**

Balance forward as of invoice dated 08/06/2020	\$24,672.30
Payments received since last invoice	\$5,910.00
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$18,762.30</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

08/06/2020	BR	Finalize agreed motion for order extending removables challenge deadlines; file re same.	0.60 hrs	165 /hr	99.00
08/06/2020	JMR	Follow up correspondence with T. Scannell regarding DIP funding (0.1); telephone conference with G. Milligan regarding same (0.2)	0.30 hrs	560 /hr	168.00
08/06/2020	SDL	Review and revise notice of extension of removables challenge deadline.	0.30 hrs	420 /hr	126.00
08/07/2020	JMR	Correspondence with T. Scannell regarding DIP Order compliance (0.2); analysis of DIP Order provisions on compliance and timing issues with same (0.4); telephone conference with G. Milligan on same (0.2)	0.80 hrs	560 /hr	448.00
08/10/2020	JMR	Analysis of options on Romspen non-funding of DIP Order (0.5); strategy conference with E. White on means to bridge funding (0.4); same draft email notice and fund options to T. Scannell (0.8); correspondence with Trustee team on same (0.3)	2.00 hrs	560 /hr	1,120.00
08/11/2020	JMR	Correspondence with regarding financing order terms and deadlines (.1)	0.10 hrs	560 /hr	56.00
08/12/2020	JMR	Correspondence with T. Scannell on funding under the financing order (0.2); correspondence with Trustee on same (0.2); correspondence with E. White on same (0.1); portion of telephone conference with G. Milligan on non-funding contingency plan (0.2)	0.50 hrs	560 /hr	280.00
08/13/2020	JMR	Analysis of options to address funding issues under financing order and alternative plans to address same (0.8); correspondence with trustee team on	3.90 hrs	560 /hr	2,184.00

		Page		1	
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP		Invoice No:		126125	
For Professional Services Rendered		Invoice through:		08/31/2020	
	same (0.2); Settlement and strategy conference with T. Scannell to advance funding under budget and financing order and resolve same (0.6); conference with G. Milligan on same (0.3); follow up correspondence on same (0.5); correspondence with D. Williamson on same (0.2); draft stipulation extending Finance Order deadlines (0.9); correspondence with G. Milligan on same (0.2); correspondence with T. Scannell (0.2)				
08/14/2020	JMR	Correspondence with Trustee and T. Scannell regarding final terms of stipulation to extend financing order deadlines (0.8); telephone conference with T. Scannell on finalizing same (0.4); final revisions and updates and finalize and file same (0.8); telephone calls to K. Mercer, L. Myers, M. Beanland, D. Williamson regarding stipulation (.6); telephone conference with L. Myers on same (.2); correspondence to each on same (.3); correspondence with T. Scannell on budget funding (.3); correspondence with Trustee team to confirm same (.3)	3.70 hrs	560 /hr	2,072.00
08/14/2020	SDL	Review and revise and correspondence related to stipulation extending challenge and credit bid deadlines.	0.30 hrs	420 /hr	126.00
08/17/2020	JMR	Portion of trustee team call on preparation of revised budget (.2); correspondence on preparation of September revised financing budget (.2)	0.40 hrs	560 /hr	224.00
08/18/2020	JMR	Correspondence with trustee team regarding amended final budget strategy and resolution of same (.2)	0.20 hrs	560 /hr	112.00
08/19/2020	JMR	Correspondence with E. White and T. Scannell on WE Aug28 funding under financing order (.2); correspondence with trustee team and same and future budget amendments (.3)	0.50 hrs	560 /hr	280.00
08/26/2020	JMR	Correspondence regarding budget funding under finance order (.2)	0.20 hrs	560 /hr	112.00
08/26/2020	SDL	Correspondence to Romspen counsel regarding weekly wire.	0.10 hrs	420 /hr	42.00
08/27/2020	SDL	Review financing order and multiple correspondences regarding deadline for reporting budget variance.	0.30 hrs	420 /hr	126.00
08/28/2020	JMR	Correspondence on budget funding and Financing order deadlines (.3); telephone conference with S. Lawrence on same (.3)	0.60 hrs	560 /hr	336.00
08/28/2020	SDL	Multiple correspondences regarding weekly funding (.2); correspondence regarding call to discuss new stipulation extending deadlines for lien creditors (.2); call regarding same (6); review and revise draft stipulation from T. Scannell (.5); correspondence with Trustee and team regarding same (.9); call with J. Rudd regarding same (.2); additional correspondence with other signatories to stipulation (.3); finalize stipulation (.6); correspondence regarding monthly variance report (.1).	3.00 hrs	420 /hr	1,260.00
Total fees for this matter		17.80 hrs		9,171.00	

Greg Milligan as proposed ch 11 trustee of  
3443 Zen Garden LP  
For Professional Services Rendered

Page 2  
Invoice No: 126125  
Invoice through: 08/31/2020

BILLING SUMMARY

TOTAL FEES	\$9,171.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	\$9,171.00
NET BALANCE FORWARD	\$18,762.30
TOTAL BALANCE NOW DUE	\$27,933.30

Timekeeper Summary

Name			Hours	Rate	Amount
Legal Assistant	BR	Brenda Ramirez	0.60	165.00	\$99.00
Partner	JMR	Jason M Rudd	13.20	560.00	\$7,392.00
Associate	SDL	Scott D. Lawrence	4.00	420.00	\$1,680.00
			17.80		\$9,171.00

Required Notice to Clients.

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## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200 phone  
(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

September 3, 2020

Invoice No: 126127  
Our File No: 7066-22 JMR  
Billing through: 08/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Reporting

TOTAL FEES	\$168.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$168.00
NET BALANCE FORWARD	\$1,410.30
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$1,578.30</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

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Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax No. 45-4183914

September 3, 2020

Invoice No. 126127  
Reference No. 7066-22 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Reporting

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122442	06/22/2020	22	JMR	\$6,659.50	\$1,331.90
123570	07/06/2020	22	JMR	\$168.00	\$33.60
124856	08/06/2020	22	JMR	\$224.00	\$44.80
Total Outstanding Balance					\$1,410.30
Total Amount Due on this Invoice					\$168.00
Total Balance Now Due					<u>\$1,578.30</u>

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$44.80	\$33.60	\$1,331.90	\$0.00	\$0.00	\$1,410.30

Please remit payment within 30 days. Thank you!



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(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

September 3, 2020

Invoice No: 126127  
Our File No: 7066-22 JMR  
Billing through: 08/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

Reporting

Balance forward as of invoice dated 08/06/2020	\$1,589.50
Payments received since last invoice	\$179.20
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$1,410.30</u>
Trust balance carried forward	\$0.00

FOR PROFESSIONAL SERVICES RENDERED

08/16/2020	JMR	Review, finalize and file July MOR (0.2); correspondence with trustee on same (0.1)	0.30 hrs	560 /hr	168.00
Total fees for this matter			0.30 hrs		<u>168.00</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 1 Invoice No: 126127 Invoice through: 08/31/2020
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**BILLING SUMMARY**

TOTAL FEES	\$168.00
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$168.00
NET BALANCE FORWARD	\$1,410.30
TOTAL BALANCE NOW DUE	\$1,578.30

**Timekeeper Summary**

Name	Hours	Rate	Amount
Partner JMR Jason M Rudd	0.30	560.00	\$168.00
	0.30		\$168.00

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Federal Tax No: 45-4183914

September 3, 2020

Invoice No: 126128  
Our File No: 7066-16 JMR  
Billing through: 08/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Litigation: Contested Matters and Adversary  
Proceedings

TOTAL FEES	\$294.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$294.00
NET BALANCE FORWARD	\$134.40
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$428.40</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

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(214) 692-6200  
(214) 692-6255  
Federal Tax No. 45-4183914

September 3, 2020

Invoice No. 126128  
Reference No. 7066-16 JMR

Greg Milligan  
Attn: Gregory S. Milligan

Litigation: Contested Matters and Adversary Proceedings

### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122440	06/22/2020	16	JMR	\$168.00	\$33.60
123566	07/06/2020	16	JMR	\$504.00	\$100.80
Total Outstanding Balance					\$134.40
Total Amount Due on this Invoice					\$294.00
Total Balance Now Due					\$428.40

### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$0.00	\$100.80	\$33.60	\$0.00	\$0.00	\$134.40

Please remit payment within 30 days. Thank you!

Wick Phillips Gould & Martin, LLP

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(214) 692-6255  
Federal Tax ID: 45-4183914

September 3, 2020

Invoice No: 126128  
Our File No: 7066-16 JMR  
Billing through: 08/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

Litigation: Contested Matters and Adversary Proceedings

Balance forward as of invoice dated 07/06/2020	\$672.00
Payments received since last invoice	\$537.60
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$134.40</u>
Trust balance carried forward	\$0.00

FOR PROFESSIONAL SERVICES RENDERED

08/19/2020	SDL	Review liens filed against property and analyze for potential priority issues (.6); correspondence to Trustee regarding same (.1).	0.70 hrs	420 /hr	294.00
Total fees for this matter			<u>0.70 hrs</u>		<u>294.00</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 1 Invoice No: 126128 Invoice through: 08/31/2020
--------------------------------------------------------------------------------------------------------	-------------------------------------------------------------

**BILLING SUMMARY**

TOTAL FEES	\$294.00
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$294.00
NET BALANCE FORWARD	\$134.40
TOTAL BALANCE NOW DUE	\$428.40

**Timekeeper Summary**

Name		Hours	Rate	Amount	
Associate	SDL	Scott D. Lawrence	0.70	420.00	\$294.00
			0.70		\$294.00

**Required Notice to Clients.**

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Federal Tax No: 45-4183914

September 3, 2020

Invoice No: 126129  
Our File No: 7066-19 JMR  
Billing through: 08/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Plan and Disclosure Statement

TOTAL FEES	\$10,318.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$10,318.00
NET BALANCE FORWARD	\$7,113.46
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$17,431.46</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

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Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax No. 45-4183914

September 3, 2020

Invoice No. 126129  
Reference No. 7066-19 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Plan and Disclosure Statement

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122437	06/22/2020	19	JMR	\$7,586.50	\$1,517.06
123571	07/06/2020	19	JMR	\$9,871.00	\$1,974.20
124859	08/06/2020	19	JMR	\$18,111.00	\$3,622.20
Total Outstanding Balance					\$7,113.46
Total Amount Due on this Invoice					\$10,318.00
Total Balance Now Due					<u>\$17,431.46</u>

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$3,622.20	\$1,974.20	\$1,517.06	\$0.00	\$0.00	\$7,113.46

Please remit payment within 30 days. Thank you!



**Wick Phillips Gould & Martin, LLP**

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(214) 692-6255  
Federal Tax ID: 45-4183914

September 3, 2020

Invoice No: 126129  
Our File No: 7066-19 JMR  
Billing through: 08/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Plan and Disclosure Statement**

Balance forward as of invoice dated 08/06/2020	\$21,602.26
Payments received since last invoice	\$14,488.80
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$7,113.46</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

08/02/2020	JMR	Draft email response to G. Milligan plan negotiation and related strategy points and questions (0.3); follow-up correspondence with R. Horton on same (0.1)	0.40 hrs	560 /hr	224.00
08/03/2020	JMR	Telephone conference with R. Horton in advance of mediation strategy call with Judge Clark and mediation parties (0.3); conference with L. Clark, counsel for mediation parties (0.7); trustee team call on next steps in advancing mediation negotiations and preparations and report on information from call with L. Clark (0.6); telephone conference with R. Horton on follow up issues (0.4); follow up mediation settlement strategy analysis in view of new lien disputes and impact on plan and unsecured class offers (0.8)	2.80 hrs	560 /hr	1,568.00
08/04/2020	JMR	Telephone conference with R. Horton regarding advancing mediation negotiations and related issues (0.2); Correspondence with T. Scannell on advancing mediation negotiations and assessment of lien claimants arguments (0.2); assessment of new disputes among parties regarding mediation (0.4); update G. Milligan on same (0.1)	0.90 hrs	560 /hr	504.00
08/05/2020	JMR	Telephone conference with T. Scannell to advance settlement discussions (0.4); Trustee team conference call on advancing plan negotiations, mediation preparations and related matters (0.5)	0.90 hrs	560 /hr	504.00
08/06/2020	JMR	Correspondence among mediation parties related to advancement of information exchange, analysis of position and related issues (0.3)	0.30 hrs	560 /hr	168.00

				Page	1
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP For Professional Services Rendered				Invoice No:	126129
				Invoice through:	08/31/2020
08/09/2020	JMR	Correspondence with T. Scannell, L. Clark and mediation parties regarding negotiations, schedule and next steps and terms for same (0.6); telephone conference with G. Milligan on same (0.2); follow up correspondence with T. Scannell (0.2)	1.00 hrs	560 /hr	560.00
08/10/2020	JMR	Correspondence among mediation parties to reschedule and advance mediation negotiations (0.5); outline issues to raise and positions in advance of call with T. Scannell and G. Milligan on same (0.3); settlement conference with T. Scannell and G. Milligan (0.5); postconference telephone call with G. Milligan on next steps (0.2); analysis of counter offer from T. Scannell and draft email memo to G. Milligan on same (1.0); telephone conference with G. Milligan regarding offer strategy (0.3); draft settlement offer response to T. Scannell (0.5); correspondence with G. Milligan on same (0.1); finalize and serve settlement offer (0.1)	3.50 hrs	560 /hr	1,960.00
08/11/2020	JMR	Correspondence with T. Scannell regarding advancing settlement negotiations (0.3); analysis of correspondence and positions on mediation continuation, schedule and issues (0.3); analysis of structures for creditor recovery scenarios based on disputes regarding secured claims and related strategy concerns (0.8)	1.40 hrs	560 /hr	784.00
08/13/2020	JMR	Strategy analysis on advancing plan treatment settlement discussions with T. Scannell and outline points, options and alternatives to address same, based on different secured claim, litigation and property disposition outcomes (1.4)	1.40 hrs	560 /hr	784.00
08/14/2020	JMR	Portion of strategy and negotiation conference with T. Scannell regarding advancing plan negotiations and plan drafting and related obstacle and issues (0.3); portion of telephone conference with G. Milligan to update and advance strategy on same (.4); extensive correspondence regarding M&M lien claimants, Rompsen and other creditors lien priority and related disputes in advance of planned mediation (0.5); analysis of litigation milestones and possible outcomes based on new stated positions to inform plan negotiations and options (0.5)	1.70 hrs	560 /hr	952.00
08/18/2020	JMR	Correspondence with GC and lien claimants regarding advancing settlement discussions (.3); correspondence with Judge Clark on same (.2); correspondence with Trustee on mediation and related lian claimant issues (.3)	0.80 hrs	560 /hr	448.00
08/19/2020	JMR	Appear for mediation with L. Clark, G. Milligan, T. Scannell and lien claimants' counsel to advance negotiations (.5); strategy conference with K. Mercer and counsel for lien claimants on same (.5); analysis of impact of potential m&m actions on plan negotiations and assessment of options on same (.4); call with G. Milligan on same (.2)	1.60 hrs	560 /hr	896.00
08/28/2020	SDL	Multiple correspondences regarding potential plan settlements and distributions.	0.30 hrs	420 /hr	126.00
08/29/2020	JMR	Analysis of new Rompsen proposal from T. Scannell on plan settlement and extensive trustee team	0.70 hrs	560 /hr	392.00

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP For Professional Services Rendered		Page 2	
		Invoice No: 126129	
		Invoice through: 08/31/2020	
08/30/2020	JMR	correspondence on same (0.7) Analysis of new data and correspondence from E. White and offer from T. Scannell and related developments to advance plan formulation and identification of issues and next steps on same (.8)	0.80 hrs 560 /hr 448.00
Total fees for this matter		18.50 hrs	10,318.00

BILLING SUMMARY

TOTAL FEES	\$10,318.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	\$10,318.00
NET BALANCE FORWARD	\$7,113.46
TOTAL BALANCE NOW DUE	\$17,431.46

Timekeeper Summary

Name	Hours	Rate	Amount
Partner JMR Jason M Rudd	18.20	560.00	\$10,192.00
Associate SDL Scott D. Lawrence	0.30	420.00	\$126.00
	18.50		\$10,318.00

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Federal Tax No: 45-4183914

September 3, 2020

Invoice No: 126130  
Our File No: 7066-20 JMR  
Billing through: 08/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Real Estate

TOTAL FEES	\$1,624.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$1,624.00
NET BALANCE FORWARD	\$347.20
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$1,971.20</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

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(214) 692-6255  
Federal Tax No. 45-4183914

September 3, 2020

Invoice No. 126130  
Reference No. 7066-20 JMR

Greg Milligan  
Attn: Gregory S. Milligan

Real Estate

### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122436	06/22/2020	20	JMR	\$1,008.00	\$201.60
124858	08/06/2020	20	JMR	\$728.00	\$145.60
Total Outstanding Balance					\$347.20
Total Amount Due on this Invoice					\$1,624.00
Total Balance Now Due					\$1,971.20

### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$145.60	\$0.00	\$201.60	\$0.00	\$0.00	\$347.20

Please remit payment within 30 days. Thank you!

**Wick Phillips Gould & Martin, LLP**

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(214) 692-6255  
Federal Tax ID: 45-4183914

September 3, 2020

Invoice No: 126130  
Our File No: 7066-20 JMR  
Billing through: 08/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

Real Estate

Balance forward as of invoice dated 08/06/2020	\$929.60
Payments received since last invoice	\$582.40
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$347.20</u>
Trust balance carried forward	\$0.00

FOR PROFESSIONAL SERVICES RENDERED

08/05/2020	JMR	Analysis of PCA in advance of team call on same (0.3); telephone conference with CW team, PCA team and Trustee team to comment on PCA to advance marketing process (0.7); follow up call with A. Zarafshani regarding same (0.3)	1.30 hrs	560 /hr	728.00
08/07/2020	JMR	Review marketing progress reports from CW (0.2)	0.20 hrs	560 /hr	112.00
08/17/2020	JMR	Analysis of potential Phase I inspection and respond to questions on same (.2); correspondence with Trustee team on same (.2)	0.40 hrs	560 /hr	224.00
08/18/2020	JMR	Represent trustee at strategy meeting with TxDOT project team to advance settlement of same to closing (.5)	0.50 hrs	560 /hr	280.00
08/25/2020	JMR	Conference with T. Irion and Trustee to advance strategy on PDA application and update hearings on same (.4); correspondence on same (.1)	0.50 hrs	560 /hr	280.00
Total fees for this matter			<u>2.90 hrs</u>		<u>1,624.00</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP	Page 1
For Professional Services Rendered	Invoice No: 126130
	Invoice through: 08/31/2020

**BILLING SUMMARY**

TOTAL FEES	\$1,624.00
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$1,624.00
NET BALANCE FORWARD	\$347.20
TOTAL BALANCE NOW DUE	\$1,971.20

**Timekeeper Summary**

Name	Hours	Rate	Amount
Partner JMR Jason M Rudd	2.90	560.00	\$1,624.00
	2.90		\$1,624.00

**Required Notice to Clients.**

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September 3, 2020

Invoice No: 126131  
Our File No: 7066-25 JMR  
Billing through: 08/31/2020

Greg Milligan  
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden, LP  
Email to: gmilligan@harneypartners.com

### Matter Summary

RE: Challenge Investigation

TOTAL FEES	\$7,000.50
TOTAL DISBURSEMENTS	\$27.61
TOTAL CHARGES FOR THIS BILL	<hr/> \$7,028.11
NET BALANCE FORWARD	\$6,563.40
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$13,591.51</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP  
Please include invoice number on payment. Thank you!



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Federal Tax No. 45-4183914

September 3, 2020

Invoice No. 126131  
Reference No. 7066-25 JMR

Greg Milligan  
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden, LP  
Email to: gmilligan@harneypartners.com

### Challenge Investigation

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122451	06/22/2020	25	JMR	\$3,021.50	\$603.20
123569	07/06/2020	25	JMR	\$17,393.50	\$3,478.70
124865	08/06/2020	25	JMR	\$12,407.50	\$2,481.50
Total Outstanding Balance					\$6,563.40
Total Amount Due on this Invoice					\$7,028.11
Total Balance Now Due					<u>\$13,591.51</u>

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$2,481.50	\$3,478.70	\$603.20	\$0.00	\$0.00	\$6,563.40

Please remit payment within 30 days. Thank you!

## Wick Phillips Gould & Martin, LLP

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(214) 692-6255  
Federal Tax ID: 45-4183914

September 3, 2020

Invoice No: 126131  
Our File No: 7066-25 JMR  
Billing through: 08/31/2020

Greg Milligan  
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden, LP  
Email to: gmilligan@harneypartners.com

### Challenge Investigation

Balance forward as of invoice dated 08/06/2020	\$16,489.40
Payments received since last invoice	\$9,926.00
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$6,563.40</u>
Trust balance carried forward	\$0.00

### FOR PROFESSIONAL SERVICES RENDERED

08/04/2020	NBN	Attend call with A. Zarafshani; correspond with prior counsel for Zen Garden; correspond with counsel for D. White; review documents produced by Rompsen.	2.50 hrs	495 /hr	1,237.50
08/05/2020	JMR	Telephone conference with N. Nelson regarding advancing investigation document requests (0.2)	0.20 hrs	560 /hr	112.00
08/05/2020	NBN	Correspond with J. Rudd regarding documents still not produced by Rompsen; prepare list of documents still needed from Rompsen; review documents produced by Rompsen.	0.80 hrs	495 /hr	396.00
08/06/2020	NBN	Attend call with Hinshaw to negotiate production of case file; prepare subpoena to D. Richardson; prepare Notice of 2004 Examination; coordinate service of same; correspond with D. Richardson and A. Zarafshani.	3.50 hrs	495 /hr	1,732.50
08/08/2020	NBN	Review additional production of documents by Rompsen; correspond with A. Zarafshani regarding certain documents produced by Rompsen.	1.50 hrs	495 /hr	742.50
08/10/2020	NBN	Correspond with T. Scannell to follow up about documents still not produced by Rompsen; review documents produced by Rompsen to determine what work was completed on project prior to Rompsen loan; correspond with J. Rudd and client regarding same.	1.70 hrs	495 /hr	841.50
08/18/2020	NBN	Correspond with D. Richardson to demand supplemental production of documents; correspond with J. Rudd and client regarding same.	0.40 hrs	495 /hr	198.00
08/19/2020	JMR	Strategy and update conference call with N. Nelson	0.40 hrs	560 /hr	224.00

			Page		1
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP			Invoice No:		126131
For Professional Services Rendered			Invoice through:		08/31/2020
and G. Milligan on status of challenge investigation (.4)					
08/19/2020	NBN	Attend call with A. Zarafshani regarding Chicago Title documents; correspond with client and J. Rudd regarding same.	0.60 hrs	495 /hr	297.00
08/28/2020	NBN	Revise and finalize agreed motion for turnover and agreed order; correspond with client regarding same; finalize and coordinate filing of motion for turnover.	1.70 hrs	495 /hr	841.50
08/28/2020	SDL	Review correspondence and draft regarding turnover motion with Hinshaw and finalize same (.4); correspondence with court regarding same (.1); correspondence with Trustee team regarding additional discovery (.4).	0.90 hrs	420 /hr	378.00
Total fees for this matter			14.20 hrs		7,000.50

#### DISBURSEMENTS

08/31/2020	Online research	27.61
Total disbursements for this matter		\$27.61

#### BILLING SUMMARY

TOTAL FEES	\$7,000.50
TOTAL DISBURSEMENTS	\$27.61
TOTAL CHARGES FOR THIS BILL	\$7,028.11
NET BALANCE FORWARD	\$6,563.40
TOTAL BALANCE NOW DUE	\$13,591.51

#### Timekeeper Summary

Name	Hours	Rate	Amount
Partner JMR Jason M Rudd	0.60	560.00	\$336.00
Partner NBN Nick B. Nelson	12.70	495.00	\$6,286.50
Associate SDL Scott D. Lawrence	0.90	420.00	\$378.00
	14.20		\$7,000.50

#### Required Notice to Clients.

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## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200 phone  
(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

September 3, 2020

Invoice No: 126132  
Our File No: 7066-03 JMR  
Billing through: 08/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Asset Analysis and Recovery

TOTAL FEES	\$7,320.50
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$7,320.50
NET BALANCE FORWARD	\$3,670.10
TOTAL BALANCE NOW DUE	<div>\$10,990.60</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP  
Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax No. 45-4183914

September 3, 2020

Invoice No. 126132  
Reference No. 7066-03 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Asset Analysis and Recovery

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122449	06/22/2020	03	JMR	\$13,166.00	\$2,633.20
123572	07/06/2020	03	JMR	\$4,118.50	\$823.70
124863	08/06/2020	03	JMR	\$1,097.85	\$213.20
Total Outstanding Balance					\$3,670.10
Total Amount Due on this Invoice					\$7,320.50
Total Balance Now Due					<u>\$10,990.60</u>

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$213.20	\$823.70	\$2,633.20	\$0.00	\$0.00	\$3,670.10

Please remit payment within 30 days. Thank you!

**Wick Phillips Gould & Martin, LLP**

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

September 3, 2020

Invoice No: 126132  
Our File No: 7066-03 JMR  
Billing through: 08/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Asset Analysis and Recovery**

Balance forward as of invoice dated 08/06/2020	\$4,554.75
Payments received since last invoice	\$884.65
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$3,670.10</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

08/05/2020	NBN	Attend call with Hinshaw representative M. Carter; correspond with Hinshaw regarding need for documents.	0.80 hrs	495 /hr	396.00
08/06/2020	JMR	Conference call with Debtors' former counsel on file transition (0.5); correspondence on same (0.3)	0.80 hrs	560 /hr	448.00
08/06/2020	NBN	Review stipulation prepared by Hinshaw and provide comments on same; correspond with Hinshaw regarding same.	0.50 hrs	495 /hr	247.50
08/07/2020	NBN	Review and revise Hinshaw stipulation regarding release of documents; correspond with Hinshaw regarding same; correspond with counsel for D. White and A. Zarafshani regarding stipulation.	1.30 hrs	495 /hr	643.50
08/11/2020	NBN	Correspond with counsel for D. White and A. Zarafshani regarding consent to production of Hinshaw documents.	0.50 hrs	495 /hr	247.50
08/11/2020	SDL	Correspondence with J. Rudd and T. Mills regarding bid procedures motion.	0.30 hrs	420 /hr	126.00
08/12/2020	NBN	Correspond with Hinshaw regarding status of document production.	0.40 hrs	495 /hr	198.00
08/14/2020	JMR	Correspondence on demands for turnover of debtors' files from former counsel and options to resolve same (.2)	0.20 hrs	560 /hr	112.00
08/14/2020	NBN	Further correspondence with Hinshaw and counsel for A. Zarafshani and D. White regarding release of documents; review amended stipulation; correspond with opposing counsel regarding same.	0.60 hrs	495 /hr	297.00
08/20/2020	NBN	Correspond with M. Carter of Hinshaw; correspond with counsel for A. Zarafshani and D. White to	0.60 hrs	495 /hr	297.00

			Page	1	
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP			Invoice No:	126132	
For Professional Services Rendered			Invoice through:	08/31/2020	
08/22/2020	NBN	reiterate request for documents; correspond with client to discuss strategy for turnover motion.	0.60 hrs	495 /hr	297.00
08/22/2020	SDL	Correspond with client to provide update on document recovery efforts and discuss strategy for turnover motion and other matters; correspond with J. Rudd regarding same.	0.10 hrs	420 /hr	42.00
08/23/2020	JMR	Correspondence to Trustee regarding recoverability of condemnation funds.	0.60 hrs	560 /hr	336.00
08/24/2020	NBN	Analysis of strategies to advance collection of debtor's legal files and propose plan of action and sample pleadings on same (0.4); correspondence with Trustee with recommendation (0.2)	2.40 hrs	495 /hr	1,188.00
08/25/2020	NBN	Review prior turnover motion; prepare agreed order requiring turnover; prepare demand letter to Hinshaw; correspond with client regarding agreed order and cover letter; correspond with Hinshaw regarding same.	1.40 hrs	495 /hr	693.00
08/26/2020	NBN	Revise agreed turnover order language to incorporate J. Rudd comments; correspond with client and opposing counsel regarding same.	2.20 hrs	495 /hr	1,089.00
08/26/2020	NBN	Attend call with Hinshaw; revise proposed order; correspond with Hinshaw regarding same; prepare unopposed motion for turnover.	0.50 hrs	495 /hr	247.50
08/31/2020	JMR	Revise agreed turnover order and correspond with Hinshaw regarding same.	0.30 hrs	560 /hr	168.00
08/31/2020	NBN	Correspondence regarding order on turnover of debtors' records (.3)	0.50 hrs	495 /hr	247.50
Correspond with Hinshaw to coordinate delivery of documents pursuant to court order.			14.60 hrs		7,320.50
Total fees for this matter					

Greg Milligan as proposed ch 11 trustee of  
3443 Zen Garden LP  
For Professional Services Rendered

Page 2  
Invoice No: 126132  
Invoice through: 08/31/2020

**BILLING SUMMARY**

TOTAL FEES	\$7,320.50
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$7,320.50
NET BALANCE FORWARD	\$3,670.10
TOTAL BALANCE NOW DUE	\$10,990.60

Timekeeper Summary

Name			Hours	Rate	Amount
Partner	JMR	Jason M Rudd	1.90	560.00	\$1,064.00
Partner	NBN	Nick B. Nelson	12.30	495.00	\$6,088.50
Associate	SDL	Scott D. Lawrence	0.40	420.00	\$168.00
			14.60		\$7,320.50

Required Notice to Clients.

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## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
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Dallas, TX 75204  
(214) 692-6200 phone  
(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

September 3, 2020

Invoice No: 126133  
Our File No: 7066-04 JMR  
Billing through: 08/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Asset Disposition

TOTAL FEES	\$22,352.00
TOTAL DISBURSEMENTS	\$226.17
TOTAL CHARGES FOR THIS BILL	<hr/> \$22,578.17
NET BALANCE FORWARD	\$3,854.80
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$26,432.97</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax No. 45-4183914

September 3, 2020

Invoice No. 126133  
Reference No. 7066-04 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Asset Disposition

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122448	06/22/2020	04	JMR	\$3,370.00	\$674.00
123574	07/06/2020	04	JMR	\$7,966.00	\$1,593.20
124866	08/06/2020	04	JMR	\$7,938.00	\$1,587.60
Total Outstanding Balance					\$3,854.80
Total Amount Due on this Invoice					\$22,578.17
Total Balance Now Due					<u>\$26,432.97</u>

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$1,587.60	\$1,593.20	\$674.00	\$0.00	\$0.00	\$3,854.80

Please remit payment within 30 days. Thank you!

**Wick Phillips Gould & Martin, LLP**

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Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

September 3, 2020

Invoice No: 126133  
Our File No: 7066-04 JMR  
Billing through: 08/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Asset Disposition**

Balance forward as of invoice dated 08/06/2020	\$10,205.20
Payments received since last invoice	\$6,350.40
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$3,854.80</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

08/04/2020	JMR	Correspondence with Cushman regarding status of marketing efforts (0.2); correspondence on PCA finalization to support same (0.2); Extensive revisions and updates to draft bid procedures (1.5); correspondence with T. Scannell on same (0.2)	2.10 hrs	560 /hr	1,176.00
08/05/2020	JMR	Analysis of comments to NDA by interested buyer and respond to same (0.3)	0.30 hrs	560 /hr	168.00
08/06/2020	JMR	Follow up correspondence with T. Scannell regarding bid procedures (0.1); telephone conference with G. Milligan regarding same (0.2)	0.30 hrs	560 /hr	168.00
08/06/2020	SDL	Review potential purchaser NDA and correspondence with Trustee regarding same.	0.30 hrs	420 /hr	126.00
08/07/2020	BR	Finalize bid procedures motion; file and serve re same.	1.50 hrs	165 /hr	247.50
08/07/2020	JMR	Correspondence with T. Scannell regarding comments to bid procedures (0.2); telephone conference with G. Milligan on same (0.2); revisions, review and approval of Bid Procedures Motion and supporting documents (4.2); coordinate filing of same (0.3)	4.90 hrs	560 /hr	2,744.00
08/11/2020	JMR	Correspondence with broker on advancement of and updates on marketing and bid milestones (.3); correspondence with Trustee team on same (.1)	0.40 hrs	560 /hr	224.00
08/12/2020	JMR	Correspondence on bid procedures and sales process (0.2)	0.20 hrs	560 /hr	112.00
08/12/2020	SDL	Prepare for and attend call with T. Mills regarding bid procedures scheduling and timing.	0.50 hrs	420 /hr	210.00
08/13/2020	JMR	Correspondence on PCA and related items for data	0.30 hrs	560 /hr	168.00

			Page		1
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP			Invoice No:		126133
For Professional Services Rendered			Invoice through:		08/31/2020
08/13/2020	SDL	room and information to present on same (0.3) Correspondence with Trustee regarding TXDOT team call.	0.10 hrs	420 /hr	42.00
08/14/2020	JMR	Analysis of sales process report from brokers and related correspondence on progress and interest (.3) Portion of telephone conference with T. Scannell on bid procedures, hearing on same, and options to advance sale process (.3); portion of strategy conference with G. Milligan on same (.4); correspondence on same with trustee team (.2)	1.20 hrs	560 /hr	672.00
08/14/2020	SDL	Prepare for and attend call with TXDOT team regarding response from TXDOT attorneys to settlement offer and next steps (.6); follow up call with M. O'Toole (.2); recap correspondence to Trustee (.3),	1.10 hrs	420 /hr	462.00
08/17/2020	JMR	Trustee team call to advance bid procedures and marketing strategy and resolution of related issues (0.7); correspondence with broker on same (.2); advance bidder due diligence and respond to questions on same (.3) correspondence on bid procedures (.3)	1.50 hrs	560 /hr	840.00
08/17/2020	SDL	Call with J. Rudd and Trustee regarding expedited setting for bid procedures hearing (.4); correspondence to confer regarding expedited setting for bid procedures motion (.1); draft motion to expedite hearing on bid procedures motion (.5); correspondence to court regarding same (.2); multiple correspondences and calls related to revised certificate of service for bid procedures motion (.5).	1.70 hrs	420 /hr	714.00
08/18/2020	JMR	Correspondence with T. Scannell regarding bid procedures (.2); coordinate preparations for hearing on same with S. Lawrence and G. Milligan (.2)	0.40 hrs	560 /hr	224.00
08/18/2020	SDL	Additional correspondence and investigation related to supplemental certificate of service for bid procedures motion (.2); draft and finalize certificate (.2).	0.40 hrs	420 /hr	168.00
08/19/2020	JMR	Telephone conference with T. Scannell on bid procedures (.5); preparation session with G. Milligan and trustee team on same (.5); strategy conference with S. Lawrence on hearing preparations and related bid procedure next steps (.4); correspondence with G. Milligan on same (.1); final pre hearing correspondence on bid procedure comments and preparations (.3)	1.80 hrs	560 /hr	1,008.00
08/19/2020	SDL	Call with J. Rudd and Trustee to prepare for hearing on bid procedures motion and additional review of motion and related documents.	1.10 hrs	420 /hr	462.00
08/20/2020	JMR	Calls (2) with S. Lawrence on bid procedure hearing preparations and developments (.4); correspondence with trustee team on developments, issues and resolution of same (.4)	0.80 hrs	560 /hr	448.00
08/20/2020	SDL	Finalize preparations for hearing (1.3); call into and present at hearing on bid procedures motion (1.5); follow up calls and correspondences with J. Rudd and Trustee (.5); correspondence with broker	6.20 hrs	420 /hr	2,604.00

		Page		2	
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP		Invoice No:		126133	
For Professional Services Rendered		Invoice through:		08/31/2020	
	regarding results of hearing (.2); revisions to order granting bid procedures and bid procedures themselves (2.6); correspondence to K. Mercer, T. Scannell, and R. Horton regarding same (.1).				
08/21/2020	SDL	Multiple correspondences with Trustee, court, and other parties related to finalizing form of order granting bid procedures motion.	0.40 hrs	420 /hr	168.00
08/22/2020	JMR	Correspondence on advancing implementation of bid procedures and related sale process issues (.3)	0.30 hrs	560 /hr	168.00
08/25/2020	JMR	Strategy conference with Trustee team to advance bid procedures, sale process and related issues (.5); correspondence on same with brokers and trustee (.3)	0.80 hrs	560 /hr	448.00
08/25/2020	SDL	Call with Trustee, J. Rudd, and E. White regarding next steps for scheduling and resolving disputes related to bid and sale procedures and Romspen credit bid rights and other challenges (.4); call with K. Mercer regarding same (.3); follow up correspondence with J. Rudd regarding same (.2).	0.90 hrs	420 /hr	378.00
08/25/2020	SDL	Calls with Trustee, J. Rudd and T. Irion regarding interplay between bid procedures dates and deadlines and seeking approval of PDA.	0.60 hrs	420 /hr	252.00
08/27/2020	SDL	Correspondence with M. Zucker regarding development of form APA for transaction.	0.20 hrs	420 /hr	84.00
08/28/2020	JMD	Call with Scott Lawrence regarding specifics of asset purchase agreement to be prepared; review various precedent documents	2.70 hrs	515 /hr	1,390.50
08/28/2020	MIZ	Email correspondence regarding purchase agreement for sale process.	0.20 hrs	515 /hr	103.00
08/28/2020	SDL	Correspondences with Chicago Title regarding asset purchase agreement from prior transaction (.3); correspondence and calls with M. Zucker and J. Dalton regarding drafting form APA for sale process (.2); call with J. Dalton regarding same (.5); follow up research and correspondence with J. Dalton regarding form of APA (.4).	1.40 hrs	420 /hr	588.00
08/30/2020	JMD	Review various bankruptcy court filings, including bid procedure order; begin preparation of asset purchase agreement	4.60 hrs	515 /hr	2,369.00
08/30/2020	JMR	Extensive correspondence on advancing sales process, updated data room information and related developments (.5)	0.50 hrs	560 /hr	280.00
08/31/2020	JMD	Prepare preliminary draft of asset purchase agreement, incorporating information from bid procedures order and various other bankruptcy filings	5.60 hrs	515 /hr	2,884.00
08/31/2020	SDL	Review and revise draft asset purchase agreement.	0.60 hrs	420 /hr	252.00
Total fees for this matter			45.90 hrs		22,352.00

DISBURSEMENTS

08/07/2020	Postage. Bankruptcy (BR)	28.00
08/07/2020	Copies Bankruptcy (BR)	134.40

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP For Professional Services Rendered		Page Invoice No: Invoice through:	3 126133 08/31/2020
08/31/2020	Thomson Reuters-West - Online Research		63.77
Total disbursements for this matter			\$226.17

BILLING SUMMARY

TOTAL FEES	\$22,352.00
TOTAL DISBURSEMENTS	\$226.17
TOTAL CHARGES FOR THIS BILL	\$22,578.17
NET BALANCE FORWARD	\$3,854.80
TOTAL BALANCE NOW DUE	\$26,432.97

Timekeeper Summary

Name			Hours	Rate	Amount
Legal Assistant	BR	Brenda Ramirez	1.50	165.00	\$247.50
Partner	JMD	Jeffrey M. Dalton	12.90	515.00	\$6,643.50
Partner	JMR	Jason M Rudd	15.80	560.00	\$8,848.00
Partner	MIZ	Matthew I. Zucker	0.20	515.00	\$103.00
Associate	SDL	Scott D. Lawrence	15.50	420.00	\$6,510.00
			45.90		\$22,352.00

Required Notice to Clients.

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(214) 692-6200 phone  
(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

September 3, 2020

Invoice No: 126134  
Our File No: 7066-14 JMR  
Billing through: 08/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Employment and Fee Application Objections

TOTAL FEES	\$224.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$224.00
NET BALANCE FORWARD	\$235.20
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$459.20</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

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(214) 692-6200  
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Federal Tax No. 45-4183914

September 3, 2020

Invoice No. 126134  
Reference No. 7066-14 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Employment and Fee Application Objections

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
123579	07/06/2020	14	JMR	\$840.00	\$168.00
124869	08/06/2020	14	JMR	\$336.00	\$67.20
Total Outstanding Balance					\$235.20
Total Amount Due on this Invoice					\$224.00
Total Balance Now Due					\$459.20

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$67.20	\$168.00	\$0.00	\$0.00	\$0.00	\$235.20

Please remit payment within 30 days. Thank you!



**Wick Phillips Gould & Martin, LLP**

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Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

September 3, 2020

Invoice No: 126134  
Our File No: 7066-14 JMR  
Billing through: 08/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Employment and Fee Application Objections**

Balance forward as of invoice dated 08/06/2020	\$504.00
Payments received since last invoice	\$268.80
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$235.20</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

08/11/2020	JMR	Correspondence with Winstead regarding receiver fee request objection resolutions (0.2); correspondence with Trustee on same (0.1)	0.30 hrs	560 /hr	168.00
08/19/2020	JMR	Telephone conference with T. Scannell on fee statement (.1)	0.10 hrs	560 /hr	56.00
Total fees for this matter			<u>0.40 hrs</u>		<u>224.00</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 1 Invoice No: 126134 Invoice through: 08/31/2020
--------------------------------------------------------------------------------------------------------	-------------------------------------------------------------

**BILLING SUMMARY**

TOTAL FEES	\$224.00
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$224.00
NET BALANCE FORWARD	\$235.20
TOTAL BALANCE NOW DUE	\$459.20

**Timekeeper Summary**

Name	Hours	Rate	Amount
Partner JMR Jason M Rudd	0.40	560.00	\$224.00
	0.40		\$224.00

**Required Notice to Clients.**

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(214) 692-6200 phone  
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Federal Tax No: 45-4183914

September 3, 2020

Invoice No: 126135  
Our File No: 7066-05 JMR  
Billing through: 08/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Assumption and Rejection of Leases and Contracts

TOTAL FEES	\$868.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$868.00
NET BALANCE FORWARD	\$8.40
TOTAL BALANCE NOW DUE	<div>\$876.40</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP  
Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax No. 45-4183914

September 3, 2020

Invoice No. 126135  
Reference No. 7066-05 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Assumption and Rejection of Leases and Contracts

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
124873	08/06/2020	05	JMR	\$42.00	\$8.40
Total Outstanding Balance					\$8.40
Total Amount Due on this Invoice					\$868.00
Total Balance Now Due					<u>\$876.40</u>

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$8.40	\$0.00	\$0.00	\$0.00	\$0.00	\$8.40

Please remit payment within 30 days. Thank you!

**Wick Phillips Gould & Martin, LLP**

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

September 3, 2020

Invoice No: 126135  
Our File No: 7066-05 JMR  
Billing through: 08/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Assumption and Rejection of Leases and Contracts**

Balance forward as of invoice dated 08/06/2020	\$42.00
Payments received since last invoice	\$33.60
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$8.40</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

08/26/2020	SDL	Correspondence with Trustee regarding Panache contract, potential assumption, and cure amounts.	0.40 hrs	420 /hr	168.00
08/28/2020	SDL	Call with counsel for Panache regarding cure costs (.4); follow up correspondences with Trustee team regarding same, including review of E. White analysis of Panache proof of claim (.5).	0.90 hrs	420 /hr	378.00
08/29/2020	SDL	Correspondence regarding and preparation for call to discuss Panache cure costs.	0.50 hrs	420 /hr	210.00
08/30/2020	JMR	Correspondence on cure claim and Panache contract issues (.2)	0.20 hrs	560 /hr	112.00
Total fees for this matter			<u>2.00 hrs</u>		<u>868.00</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP For Professional Services Rendered	Page 1 Invoice No: 126135 Invoice through: 08/31/2020
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BILLING SUMMARY

TOTAL FEES	\$868.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	\$868.00
NET BALANCE FORWARD	\$8.40
TOTAL BALANCE NOW DUE	\$876.40

Timekeeper Summary

Name			Hours	Rate	Amount
Partner	JMR	Jason M Rudd	0.20	560.00	\$112.00
Associate	SDL	Scott D. Lawrence	1.80	420.00	\$756.00
			2.00		\$868.00

Required Notice to Clients.

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(214) 692-6200 phone  
(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

September 3, 2020

Invoice No: 126136  
Our File No: 7066-08 JMR  
Billing through: 08/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Business Operations

TOTAL FEES	\$2,760.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$2,760.00
NET BALANCE FORWARD	\$3,292.80
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$6,052.80</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax No. 45-4183914

September 3, 2020

Invoice No. 126136  
Reference No. 7066-08 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Business Operations

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122446	06/22/2020	08	JMR	\$5,026.00	\$1,005.20
123575	07/06/2020	08	JMR	\$6,286.00	\$1,257.20
124861	08/06/2020	08	JMR	\$5,152.00	\$1,030.40
Total Outstanding Balance					\$3,292.80
Total Amount Due on this Invoice					\$2,760.00
Total Balance Now Due					<u>\$6,052.80</u>

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$1,030.40	\$1,257.20	\$1,005.20	\$0.00	\$0.00	\$3,292.80

Please remit payment within 30 days. Thank you!



**Wick Phillips Gould & Martin, LLP**

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(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

September 3, 2020

Invoice No: 126136  
Our File No: 7066-08 JMR  
Billing through: 08/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Business Operations**

Balance forward as of invoice dated 08/06/2020	\$7,414.40
Payments received since last invoice	\$4,121.60
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$3,292.80</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

08/05/2020	JMR	Correspondence on critical vender payments and related agreements (0.2)	0.20 hrs	560 /hr	112.00
08/07/2020	JMR	Telephone conference with G. Milligan on status of property (0.2); correspondence and reports from GC on same (0.1)	0.30 hrs	560 /hr	168.00
08/13/2020	JMR	Telephone conference with G. Milligan on potential wind down of operations absent funding (0.3); analysis of report on same and draft correspondence with T. Scannell (0.3); correspondence with Panache on funding of continuing work on project (0.2); telephone conference with R. Horton on same (0.2)	1.00 hrs	560 /hr	560.00
08/14/2020	JMR	Correspondence with GC and trustee team on continuation and funding of preservation operations (.2); correspondence on vender issues on same (.2)	0.40 hrs	560 /hr	224.00
08/14/2020	SDL	Review vendor agreement related to prepetition vendor claims and revise for specific claimant (.5); correspondence and call with E. White regarding same (.3).	0.80 hrs	420 /hr	336.00
08/17/2020	SDL	Review order granting authority to pay prepetition claims and correspondence to E. White regarding record-keeping obligations contained therein.	0.70 hrs	420 /hr	294.00
08/18/2020	DGJ	Pursue strategy re. drafting letter to Austin PD re. break-in (0.2); draft letter to Austin PD re. break-in (0.6)	0.80 hrs	335 /hr	268.00
08/18/2020	SDL	Correspondence and call to D. Heringer regarding letter to Austin Police (.2); review and revise letter and correspondence with J. Rudd and Trustee	0.60 hrs	420 /hr	252.00

			Page		1
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP			Invoice No:		126136
For Professional Services Rendered			Invoice through:		08/31/2020
08/26/2020	SDL	regarding same (.4). Finalize and send letter to Austin Police regarding August 9/10 break in and requesting further information (.4); follow up call with APD Sergeant (.2); follow up correspondence to A. Zarafshani regarding same (.1); additional follow up call with APD Sergeant (.2).	0.90 hrs	420 /hr	378.00
08/30/2020	JMR	Analysis of updated work reports and related correspondence on development operations to advance same (.3)	0.30 hrs	560 /hr	168.00
Total fees for this matter			6.00 hrs		2,760.00

**BILLING SUMMARY**

TOTAL FEES	\$2,760.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	\$2,760.00
NET BALANCE FORWARD	\$3,292.80
TOTAL BALANCE NOW DUE	\$6,052.80

**Timekeeper Summary**

Name			Hours	Rate	Amount
Associate	DGJ	Daniella G. Heringer	0.80	335.00	\$268.00
Partner	JMR	Jason M Rudd	2.20	560.00	\$1,232.00
Associate	SDL	Scott D. Lawrence	3.00	420.00	\$1,260.00
			6.00		\$2,760.00

**Required Notice to Clients.**

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Federal Tax No: 45-4183914

September 3, 2020

Invoice No: 126137  
Our File No: 7066-09 JMR  
Billing through: 08/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Case Administration

TOTAL FEES	\$198.00
TOTAL DISBURSEMENTS	\$314.50
TOTAL CHARGES FOR THIS BILL	<hr/> \$512.50
NET BALANCE FORWARD	\$665.60
TOTAL BALANCE NOW DUE	<div>\$1,178.10</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP  
Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax No. 45-4183914

September 3, 2020

Invoice No. 126137  
Reference No. 7066-09 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Case Administration

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122445	06/22/2020	09	JMR	\$2,688.00	\$537.60
123576	07/06/2020	09	JMR	\$532.00	\$106.40
124862	08/06/2020	09	JMR	\$108.00	\$21.60
Total Outstanding Balance					\$665.60
Total Amount Due on this Invoice					\$512.50
Total Balance Now Due					<u>\$1,178.10</u>

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$21.60	\$106.40	\$537.60	\$0.00	\$0.00	\$665.60

Please remit payment within 30 days. Thank you!

Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
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(214) 692-6255  
Federal Tax ID: 45-4183914

September 3, 2020

Invoice No: 126137  
Our File No: 7066-09 JMR  
Billing through: 08/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

Case Administration

Balance forward as of invoice dated 08/06/2020	\$752.00
Payments received since last invoice	\$86.40
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$665.60</u>
Trust balance carried forward	\$0.00

FOR PROFESSIONAL SERVICES RENDERED

08/25/2020	BR	Prepare certificate of service; file and serve re same.	1.20 hrs	165 /hr	198.00
Total fees for this matter			<u>1.20 hrs</u>		<u>198.00</u>

DISBURSEMENTS

08/28/2020	Postage. (BR)	27.50
08/28/2020	Copies (BR)	77.00
08/29/2020	Special Delivery, Inc. - Process Serving	210.00
Total disbursements for this matter		<u>\$314.50</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 1 Invoice No: 126137 Invoice through: 08/31/2020
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**BILLING SUMMARY**

TOTAL FEES	\$198.00
TOTAL DISBURSEMENTS	\$314.50
TOTAL CHARGES FOR THIS BILL	\$512.50
NET BALANCE FORWARD	\$665.60
TOTAL BALANCE NOW DUE	\$1,178.10

**Timekeeper Summary**

Name	Hours	Rate	Amount
Legal BR Brenda Ramirez	1.20	165.00	\$198.00
Assistant	1.20		\$198.00

**Required Notice to Clients.**

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Suite 500  
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(214) 692-6200 phone  
(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

September 3, 2020

Invoice No: 126138  
Our File No: 7066-13 JMR  
Billing through: 08/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Employment and Fee Applications

TOTAL FEES	\$7,561.50
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$7,561.50
NET BALANCE FORWARD	\$12,038.14
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$19,599.64</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax No. 45-4183914

September 3, 2020

Invoice No. 126138  
Reference No. 7066-13 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Employment and Fee Applications

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122443	06/22/2020	13	JMR	\$23,797.72	\$4,759.54
123578	07/06/2020	13	JMR	\$32,256.00	\$6,451.20
124868	08/06/2020	13	JMR	\$4,137.00	\$827.40
Total Outstanding Balance					\$12,038.14
Total Amount Due on this Invoice					\$7,561.50
Total Balance Now Due					<u>\$19,599.64</u>

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$827.40	\$6,451.20	\$4,759.54	\$0.00	\$0.00	\$12,038.14

Please remit payment within 30 days. Thank you!



**Wick Phillips Gould & Martin, LLP**

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Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

September 3, 2020

Invoice No: 126138  
Our File No: 7066-13 JMR  
Billing through: 08/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Employment and Fee Applications**

Balance forward as of invoice dated 08/06/2020	\$15,347.74
Payments received since last invoice	\$3,309.60
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$12,038.14</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

08/03/2020	DGJ	Pursue strategy re. preparing Interim Fee Applications for Wick Phillips, Harney Partners, and Sprouse Shrader (0.5)	0.50 hrs	335 /hr	167.50
08/03/2020	SDL	Call and correspondence with D. Heringer regarding interim fee applications for Wick Phillips, Harney, and Sprouse.	0.50 hrs	420 /hr	210.00
08/07/2020	SDL	Correspondence to Trustee regarding professional payment.	0.10 hrs	420 /hr	42.00
08/10/2020	DGJ	Draft Summary of First Interim Fee Application re. Wick Phillips (0.8); begin to draft First Interim Fee Application re. Wick Phillips (2.3)	3.10 hrs	335 /hr	1,038.50
08/10/2020	JMR	Review draft and serve Notice of Trustee professionals' fee statements for July 2020 per fee procedures order (0.4); correspondence with T. Irion on same (0.1)	0.50 hrs	560 /hr	280.00
08/11/2020	DGJ	Continue to draft First Interim Fee Application re. Wick Phillips (1.9); confer on strategy re. First Interim Fee Application re. Wick Phillips (0.9); analyze, review, and revise Summary of First Interim Fee Application re. Wick Phillips (1.8)	4.60 hrs	335 /hr	1,541.00
08/11/2020	SDL	Call with D. Heringer to discuss interim fee application drafts and additional revisions thereto.	0.50 hrs	420 /hr	210.00
08/12/2020	DGJ	Finish drafting First Interim Fee Application re. Wick Phillips (1.5); prepare proposed order granting First Interim Fee Application re. Wick Phillips (0.3); prepare summary for First Interim Fee Application re. Harney Partners (0.7); begin drafting First Interim Fee Application re. Harney Partners (0.7);	4.70 hrs	335 /hr	1,574.50

			Page		1
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP			Invoice No:		126138
For Professional Services Rendered			Invoice through:		08/31/2020
		pursue strategy re, revisions to First Interim Fee Application re. Wick Phillips (1.0); begin to analyze, review, and revise First Interim Fee Application re. Wick Phillips based on phone conference (0.5)			
08/12/2020	SDL	Call and correspondence with D. Heringer and revisions regarding interim fee applications.	0.50 hrs	420 /hr	210.00
08/13/2020	DGJ	Continue to analyze, review, and revise First Interim Fee Application re. Wick Phillips based on phone conference (1.9)	1.90 hrs	335 /hr	636.50
08/13/2020	SDL	Call with D. Heringer regarding interim fee applications (.4); revisions to same (.5).	0.90 hrs	420 /hr	378.00
08/14/2020	DGJ	Complete drafting First Interim Fee Application re. Harney Partners (1.1); prepare proposed order granting First Interim Fee Application re. Harney Partners (0.2)	1.30 hrs	335 /hr	435.50
08/17/2020	DGJ	Prepare summary for First Interim Fee Application re. Sprouse (0.8)	0.80 hrs	335 /hr	268.00
08/18/2020	DGJ	Prepare First Interim Fee Application re. Sprouse (0.9); revise summary of First Interim Fee Application re. Sprouse (0.1); draft proposed order granting First Interim Fee Application re. Sprouse (0.2)	1.20 hrs	335 /hr	402.00
08/31/2020	SDL	Correspondence with Trustee regarding potential additional professional retention.	0.40 hrs	420 /hr	168.00
Total fees for this matter			21.50 hrs		7,561.50

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 2 Invoice No: 126138 Invoice through: 08/31/2020
--------------------------------------------------------------------------------------------------------	-------------------------------------------------------------

**BILLING SUMMARY**

TOTAL FEES	\$7,561.50
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$7,561.50
NET BALANCE FORWARD	\$12,038.14
TOTAL BALANCE NOW DUE	\$19,599.64

Timekeeper Summary

Name			Hours	Rate	Amount
Associate	DGJ	Daniella G. Heringer	18.10	335.00	\$6,063.50
Partner	JMR	Jason M Rudd	0.50	560.00	\$280.00
Associate	SDL	Scott D. Lawrence	2.90	420.00	\$1,218.00
			21.50		\$7,561.50

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(214) 692-6200 phone  
(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

September 3, 2020

Invoice No: 126139  
Our File No: 7066-17 JMR  
Billing through: 08/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Meetings and Communications with Creditors

TOTAL FEES	\$168.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$168.00
NET BALANCE FORWARD	\$812.00
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$980.00</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP  
Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

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(214) 692-6200  
(214) 692-6255  
Federal Tax No. 45-4183914

September 3, 2020

Invoice No. 126139  
Reference No. 7066-17 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Meetings and Communications with Creditors

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122439	06/22/2020	17	JMR	\$2,072.00	\$414.40
123573	07/06/2020	17	JMR	\$1,218.00	\$243.60
124871	08/06/2020	17	JMR	\$770.00	\$154.00
Total Outstanding Balance					\$812.00
Total Amount Due on this Invoice					\$168.00
Total Balance Now Due					\$980.00

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$154.00	\$243.60	\$414.40	\$0.00	\$0.00	\$812.00

Please remit payment within 30 days. Thank you!

**Wick Phillips Gould & Martin, LLP**

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(214) 692-6255  
Federal Tax ID: 45-4183914

September 3, 2020

Invoice No: 126139  
Our File No: 7066-17 JMR  
Billing through: 08/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Meetings and Communications with Creditors**

Balance forward as of invoice dated 08/06/2020	\$1,428.00
Payments received since last invoice	\$616.00
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$812.00</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

08/27/2020	SDL	Correspondence to counsel for Schindler Elevators regarding claim.	0.10 hrs	420 /hr	42.00
08/28/2020	SDL	Call with counsel for Schindler Elevator regarding claim.	0.30 hrs	420 /hr	126.00
Total fees for this matter			<u>0.40 hrs</u>		<u>168.00</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP For Professional Services Rendered	Page 1 Invoice No: 126139 Invoice through: 08/31/2020
--------------------------------------------------------------------------------------------------------	-------------------------------------------------------------

**BILLING SUMMARY**

TOTAL FEES	\$168.00
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$168.00
NET BALANCE FORWARD	\$812.00
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$980.00</div>

**Timekeeper Summary**

Name		Hours	Rate	Amount
Associate	SDL	Scott D. Lawrence		
		0.40	420.00	\$168.00
		0.40		\$168.00

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(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

September 3, 2020

Invoice No: 126140  
Our File No: 7066-10 JMR  
Billing through: 08/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Claims Administration and Objections

TOTAL FEES	\$1,064.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$1,064.00
NET BALANCE FORWARD	\$524.60
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$1,588.60</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP  
Please include invoice number on payment. Thank you!



## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax No. 45-4183914

September 3, 2020

Invoice No. 126140  
Reference No. 7066-10 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Claims Administration and Objections

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122444	06/22/2020	10	JMR	\$630.00	\$126.00
123581	07/06/2020	10	JMR	\$1,713.00	\$342.60
124867	08/06/2020	10	JMR	\$280.00	\$56.00
Total Outstanding Balance					\$524.60
Total Amount Due on this Invoice					\$1,064.00
Total Balance Now Due					<u>\$1,588.60</u>

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$56.00	\$342.60	\$126.00	\$0.00	\$0.00	\$524.60

Please remit payment within 30 days. Thank you!

**Wick Phillips Gould & Martin, LLP**

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(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

September 3, 2020

Invoice No: 126140  
Our File No: 7066-10 JMR  
Billing through: 08/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Claims Administration and Objections**

Balance forward as of invoice dated 08/06/2020	\$748.60
Payments received since last invoice	\$224.00
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$524.60</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

08/10/2020	JMR	Analysis of new claims to inform claims pool for mediation (0.4); correspondence on Schendler claim and appearance (0.1)	0.50 hrs	560 /hr	280.00
08/11/2020	JMR	Analysis of newly filed proofs of claim and assess impact on plan negotiations and structures (0.5); correspondence with E. White on same (0.1)	0.60 hrs	560 /hr	336.00
08/13/2020	JMR	Telephone conference with E. White on updated claims analysis (0.2); analysis of revised analysis to inform unsecured class and secured class and changes since prior analysis (0.4); correspondence with Trustee team on same (0.2)	0.80 hrs	560 /hr	448.00
Total fees for this matter			<u>1.90 hrs</u>		<u>1,064.00</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 1 Invoice No: 126140 Invoice through: 08/31/2020
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**BILLING SUMMARY**

TOTAL FEES	\$1,064.00
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$1,064.00
NET BALANCE FORWARD	\$524.60
TOTAL BALANCE NOW DUE	\$1,588.60

**Timekeeper Summary**

Name	Hours	Rate	Amount
Partner JMR Jason M Rudd	1.90	560.00	\$1,064.00
	1.90		\$1,064.00

**Required Notice to Clients.**

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Federal Tax No: 45-4183914

October 7, 2020

Invoice No: 127387  
Our File No: 7066-15 JMR  
Billing through: 09/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Financing and Cash Collateral

TOTAL FEES	\$3,972.50
TOTAL DISBURSEMENTS	\$870.55
TOTAL CHARGES FOR THIS BILL	<hr/> \$4,843.05
NET BALANCE FORWARD	\$20,596.50
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$25,439.55</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax No. 45-4183914

October 7, 2020

Invoice No. 127387  
Reference No. 7066-15 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Financing and Cash Collateral

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122441	06/22/2020	15	JMR	\$52,173.50	\$10,434.70
123580	07/06/2020	15	JMR	\$34,250.50	\$6,850.10
124870	08/06/2020	15	JMR	\$7,387.50	\$1,477.50
126125	09/03/2020	15	JMR	\$9,171.00	\$1,834.20
Total Outstanding Balance					\$20,596.50
Total Amount Due on this Invoice					\$4,843.05
Total Balance Now Due					\$25,439.55

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$0.00	\$1,834.20	\$1,477.50	\$17,284.80	\$0.00	\$20,596.50

Please remit payment within 30 days. Thank you!

**Wick Phillips Gould & Martin, LLP**

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(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

October 7, 2020

Invoice No: 127387  
Our File No: 7066-15 JMR  
Billing through: 09/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Financing and Cash Collateral**

Balance forward as of invoice dated 09/03/2020	\$27,933.30
Payments received since last invoice	\$7,336.80
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$20,596.50</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

09/09/2020	SDL	Call with Trustee, J. Rudd, and E. White regarding funding deadline, budget, and other matters related to financing.	0.20 hrs	420 /hr	84.00
09/16/2020	JMR	Analysis of draft revised Final Budget for Oct. and comment on same (.4); correspondence with E. White and G. Milligan on same (.3); correspondence with T. Scannell on same (.2)	0.90 hrs	560 /hr	504.00
09/18/2020	JMR	Correspondence with G. Milligan on budget approval and status of funding (.3); correspondence with A.Z. on same (.1); correspondence with T. Scannell on same (.2)	0.60 hrs	560 /hr	336.00
09/20/2020	JMR	Correspondence anndn portion of call with G. Milligan on budget approval and status of funding (.2); portion of conference with T. Scannell on same (.2)	0.40 hrs	560 /hr	224.00
09/20/2020	SDL	Correspondence with J. Rudd regarding term sheet, loan agreement, and calculation of loan funding.	1.50 hrs	420 /hr	630.00
09/21/2020	BR	Participate in conference call with J. Rudd, S. Lawrence and N. Nelson; prepare exhibits, revise witness and exhibit list; finalize notice of amended final budget; file re same.	2.10 hrs	165 /hr	346.50
09/21/2020	JMR	Correspondence with T. Scannell on amended budget approval (.3); telephone conference with T. Scannell on same (.2); correspondence with trustee team on revised budget approval and comments (.2); finalize and file amended budget (.3); revise and finalize extension of financing order deadlines (.8); telephone ocnference with T. Scannell to approve same (.2); finalize and file extensions (.2)	2.20 hrs	560 /hr	1,232.00

			Page		1
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP			Invoice No:		127387
For Professional Services Rendered			Invoice through:		09/30/2020
09/21/2020	SDL	Draft stipulation regarding extension of deadlines in financing order (.3); draft notice of amended budget regarding same (.4); correspondence and call with J. Rudd regarding same (.1).	0.80 hrs	420 /hr	336.00
09/30/2020	JMR	Correspondence with E. White and T. Scannel on budget funding request (.2); correspondence on available funding under budget and financing order (.3)	0.50 hrs	560 /hr	280.00
Total fees for this matter			9.20 hrs		3,972.50

#### DISBURSEMENTS

09/30/2020	Kim Tindall & Associates, LLC - Court Reporting Video Conference Transcript (Virtual Auction)	870.55
Total disbursements for this matter		\$870.55

#### BILLING SUMMARY

TOTAL FEES	\$3,972.50
TOTAL DISBURSEMENTS	\$870.55
TOTAL CHARGES FOR THIS BILL	\$4,843.05
NET BALANCE FORWARD	\$20,596.50
TOTAL BALANCE NOW DUE	\$25,439.55

#### Timekeeper Summary

Name			Hours	Rate	Amount
Legal Assistant	BR	Brenda Ramirez	2.10	165.00	\$346.50
Partner	JMR	Jason M Rudd	4.60	560.00	\$2,576.00
Associate	SDL	Scott D. Lawrence	2.50	420.00	\$1,050.00
			9.20		\$3,972.50

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Federal Tax No: 45-4183914

October 7, 2020

Invoice No: 127388  
Our File No: 7066-25 JMR  
Billing through: 09/30/2020

Greg Milligan  
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden, LP  
Email to: gmilligan@harneypartners.com

### Matter Summary

RE: Challenge Investigation

TOTAL FEES	\$17,323.50
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$17,323.50
NET BALANCE FORWARD	\$7,963.50
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$25,287.00</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!



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(214) 692-6255  
Federal Tax No. 45-4183914

October 7, 2020

Invoice No. 127388  
Reference No. 7066-25 JMR

Greg Milligan  
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden, LP  
Email to: gmilligan@harneypartners.com

### Challenge Investigation

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122451	06/22/2020	25	JMR	\$3,021.50	\$603.20
123569	07/06/2020	25	JMR	\$17,393.50	\$3,478.70
124865	08/06/2020	25	JMR	\$12,407.50	\$2,481.50
126131	09/03/2020	25	JMR	\$7,028.11	\$1,400.10
Total Outstanding Balance					\$7,963.50
Total Amount Due on this Invoice					\$17,323.50
Total Balance Now Due					\$25,287.00

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$0.00	\$1,400.10	\$2,481.50	\$4,081.90	\$0.00	\$7,963.50

Please remit payment within 30 days. Thank you!

# Wick Phillips Gould & Martin, LLP

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(214) 692-6255  
Federal Tax ID: 45-4183914

October 7, 2020

Invoice No: 127388  
Our File No: 7066-25 JMR  
Billing through: 09/30/2020

Greg Milligan  
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden, LP  
Email to: gmilligan@harneypartners.com

## Challenge Investigation

Balance forward as of invoice dated 09/03/2020	\$13,591.51
Payments received since last invoice	\$5,628.01
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$7,963.50</u>
Trust balance carried forward	\$0.00

## FOR PROFESSIONAL SERVICES RENDERED

09/09/2020	NBN	Review D. Richardson document production; prepare adversary complaint.	4.40 hrs	495 /hr	2,178.00
09/10/2020	NBN	Draft and revise adversary complaint; review documents produced by third parties.	3.50 hrs	495 /hr	1,732.50
09/11/2020	NBN	Draft and revise adversary complaint; review documents produced by Romspen and A. Zarafshani; correspond with counsel for A. Zarafshani regarding pending document requests.	2.50 hrs	495 /hr	1,237.50
09/13/2020	JMR	Research and analysis of handling of credit bid protections in context of auction and draft motion related to auction process (3.5)	3.50 hrs	560 /hr	N/C
09/14/2020	JMR	Draft and strategy and related preparations regarding credit bid challenge motion (2.5); correspondence and strategy on same (.5); telephone conference with Trustee on same (.2)	3.20 hrs	560 /hr	N/C
09/15/2020	JMR	Revise, finalize and file credit bid challenge motion (4.5)(n/c)	4.50 hrs	560 /hr	N/C
09/15/2020	NBN	Review and revise draft motion to limit credit bid rights; correspond with J. Rudd regarding same; review documents produced by Hinshaw; review forbearance agreement prepared by Romspen; correspond with J. Rudd regarding same.	2.50 hrs	495 /hr	1,237.50
09/15/2020	SDL	Review and finalize motion to limit Romspen credit bid (1.0); draft proposed order regarding same (.3); correspondence and calls with J. Rudd regarding same (.2).	1.50 hrs	420 /hr	630.00
09/16/2020	NBN	Correspond with D. Richardson regarding availability to attend hearing on credit bid motion.	0.40 hrs	495 /hr	198.00

			Page		1
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP			Invoice No:		127388
For Professional Services Rendered			Invoice through:		09/30/2020
09/17/2020	NBN	Attend call with client; prepare subpoenas to A. Zarafshani and D. Richardson to appear at hearing on credit bid motion.	1.50 hrs	495 /hr	742.50
09/18/2020	NBN	Coordinate service of A. Richardson subpoena; review documents to identify exhibits for credit bid hearing; attend call with client and J. Rudd.	3.50 hrs	495 /hr	1,732.50
09/18/2020	SDL	Correspondence and call with J. Rudd, N. Nelson, and Trustee regarding exhibits and witnesses for credit bid challenge hearing (.2); draft witness and exhibit list for hearing (.3); assemble exhibits related to same (.9); correspondence and call with Trustee team regarding preparation for hearing (.4); draft direct examination of G. Milligan for credit bid hearing (2.0).	3.80 hrs	420 /hr	1,596.00
09/20/2020	NBN	Prepare exhibits and direct examination outlines for hearing on emergency motion to prevent Romspen credit bid; review documents produced by Romspen and other third parties.	5.50 hrs	495 /hr	2,722.50
09/21/2020	NBN	Revise and finalize deposition outlines; review and finalize witness and exhibit lists; review documents produced by Romspen; D. Richardson, etc.	6.70 hrs	495 /hr	3,316.50
09/21/2020	SDL	Call with J. Rudd, N. Nelson and B. Ramirez regarding witness and exhibit lists for credit bid motion and other hearing preparation.	0.50 hrs	420 /hr	N/C
Total fees for this matter			47.50 hrs		17,323.50

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP For Professional Services Rendered	Page Invoice No: Invoice through:	2 127388 09/30/2020
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**BILLING SUMMARY**

TOTAL FEES	\$17,323.50
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	\$17,323.50
NET BALANCE FORWARD	\$7,963.50
TOTAL BALANCE NOW DUE	\$25,287.00

**Timekeeper Summary**

Name			Hours	Rate	Amount
Partner	JMR	Jason M Rudd	11.20	0.00	\$0.00
Partner	NBN	Nick B. Nelson	30.50	495.00	\$15,097.50
Associate	SDL	Scott D. Lawrence	0.50	0.00	\$0.00
Associate	SDL	Scott D. Lawrence	5.30	420.00	\$2,226.00
			47.50		\$17,323.50

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Federal Tax No: 45-4183914

October 7, 2020

Invoice No: 127389  
Our File No: 7066-16 JMR  
Billing through: 09/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Litigation: Contested Matters and Adversary  
Proceedings

TOTAL FEES	\$1,164.50
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$1,164.50
NET BALANCE FORWARD	\$193.20
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$1,357.70</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP  
Please include invoice number on payment. Thank you!

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(214) 692-6255  
Federal Tax No. 45-4183914

October 7, 2020

Invoice No. 127389  
Reference No. 7066-16 JMR

Greg Milligan  
Attn: Gregory S. Milligan

Litigation: Contested Matters and Adversary Proceedings

### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122440	06/22/2020	16	JMR	\$168.00	\$33.60
123566	07/06/2020	16	JMR	\$504.00	\$100.80
126128	09/03/2020	16	JMR	\$294.00	\$58.80
Total Outstanding Balance					\$193.20
Total Amount Due on this Invoice					\$1,164.50
Total Balance Now Due					<u>\$1,357.70</u>

### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$0.00	\$58.80	\$0.00	\$134.40	\$0.00	\$193.20

Please remit payment within 30 days. Thank you!

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Federal Tax ID: 45-4183914

October 7, 2020

Invoice No: 127389  
Our File No: 7066-16 JMR  
Billing through: 09/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

Litigation: Contested Matters and Adversary Proceedings

Balance forward as of invoice dated 09/03/2020	\$428.40
Payments received since last invoice	\$235.20
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$193.20</u>
Trust balance carried forward	\$0.00

FOR PROFESSIONAL SERVICES RENDERED

09/29/2020	DGJ	Research Motion to Convert Case from Chapter 11 to Chapter 7 (0.2); pursue strategy re. Motion to Convert Case (0.1); prepare Motion to Convert Case from Chapter 11 to Chapter 7 (2.5); prepare proposed order granting Motion to Convert Case from Chapter 11 to Chapter 7 (0.3)	3.10 hrs	335 /hr	1,038.50
09/29/2020	SDL	Calls and correspondence with D. Heringer regarding motion to convert.	0.20 hrs	420 /hr	84.00
09/30/2020	SDL	Correspondence with Trustee and J. Rudd regarding document productions.	0.10 hrs	420 /hr	42.00
Total fees for this matter			3.40 hrs		<u>1,164.50</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 1 Invoice No: 127389 Invoice through: 09/30/2020
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**BILLING SUMMARY**

TOTAL FEES	\$1,164.50
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$1,164.50
NET BALANCE FORWARD	\$193.20
TOTAL BALANCE NOW DUE	\$1,357.70

**Timekeeper Summary**

Name		Hours	Rate	Amount	
Associate	DGJ	Daniella G. Heringer	3.10	335.00	\$1,038.50
Associate	SDL	Scott D. Lawrence	0.30	420.00	\$126.00
			3.40		\$1,164.50

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October 7, 2020

Invoice No: 127390  
Our File No: 7066-19 JMR  
Billing through: 09/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Plan and Disclosure Statement

TOTAL FEES	\$33,810.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$33,810.00
NET BALANCE FORWARD	\$9,177.06
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$42,987.06</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

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(214) 692-6255  
Federal Tax No. 45-4183914

October 7, 2020

Invoice No. 127390  
Reference No. 7066-19 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Plan and Disclosure Statement

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122437	06/22/2020	19	JMR	\$7,586.50	\$1,517.06
123571	07/06/2020	19	JMR	\$9,871.00	\$1,974.20
124859	08/06/2020	19	JMR	\$18,111.00	\$3,622.20
126129	09/03/2020	19	JMR	\$10,318.00	\$2,063.60
Total Outstanding Balance					\$9,177.06
Total Amount Due on this Invoice					\$33,810.00
Total Balance Now Due					\$42,987.06

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$0.00	\$2,063.60	\$3,622.20	\$3,491.26	\$0.00	\$9,177.06

Please remit payment within 30 days. Thank you!

**Wick Phillips Gould & Martin, LLP**

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(214) 692-6255  
Federal Tax ID: 45-4183914

October 7, 2020

Invoice No: 127390  
Our File No: 7066-19 JMR  
Billing through: 09/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Plan and Disclosure Statement**

Balance forward as of invoice dated 09/03/2020	\$17,431.46
Payments received since last invoice	\$8,254.40
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$9,177.06</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

09/01/2020	JMR	Portion of trustee team strategy call to advance plan negotiations with secured creditors, unsecured pool and related issues (.5); strategy conference with K. Mercer regarding negotiations for treatment of secured claims, and related plan discussions (.6); correspondence with T. Scannell on same (.2); correspondence with parties on same (.3); outline options to address potential conflicting settlement among creditors, impact of same on plan and sale timing and related assessment of best means to reach consensual plan (1.2)	2.80 hrs	560 /hr	1,568.00
09/02/2020	JMR	Settlement conference with T. Scannell to advance plan negotiations (.5); email memo to Trustee on options and assessment of next steps (.3); strategy conference with Trustee team on same (.9); strategy conference with R. Horton on same (.4); correspondence with trustee team on same (.2); strategy with S. Lawrence and N. Nelson on same (.3)	2.60 hrs	560 /hr	1,456.00
09/03/2020	JMR	Extensive strategy conference with G. Milligan and trustee team on options to reach plan treatment settlement with Romspen, based on status of secured creditor negotiations and related assessments and planning (1.0); conference with R. Horton on advancing Panache discussions on same (.3); analysis of updated claim pool data to inform same (.4)	1.70 hrs	560 /hr	952.00
09/04/2020	JMR	Correspondence with T. Scannell regarding advancing plan negotiations among all parties (.2);	0.90 hrs	560 /hr	504.00

		Page		1	
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP		Invoice No:		127390	
For Professional Services Rendered		Invoice through:		09/30/2020	
09/07/2020	JMR	telephone conference with R. Horton on same (.3); correspondence with G. Milligan on same (.2); correspondence with K. Mercer on same (.1) Analysis of upcoming deadlines in formulation of plan negotiations strategy and related issues to inform conference call with G. Milligan, R. Horton and K. Mercer on same (.7); strategy and settlement conference with Trustee, R. Horton and K. Mercer (.4); correspondence with T. Scannell on same (.3)	1.40 hrs	560 /hr	784.00
09/08/2020	JMR	Settlement and scheduling conference with T. Scannell, R. Horton, G. Milligan, K. Mercer (.5); strategy conference with G. Milligan (.2); analysis of Panache settlement offer (.3)	1.00 hrs	560 /hr	560.00
09/09/2020	JMR	Settlement conference with T. Scannell, K. Mercer, R. Horton and G. Milligan to advance settlement of claims treatment and plan (.7); strategy conferences (2) with G. Milligan regarding same (.4); correspondence with T. Scannell on same (.3); correspondence with G. Milligan and trustee team on same (.3)	1.70 hrs	560 /hr	952.00
09/10/2020	JMR	Assessment of strategy options to advance negotiations with Romspen in view of developments with M&M and Panache negotiations (1.4); strategy update and formulation with G. Milligan and trustee team (.6); correspondence with K. Mercer, R. Horton and T. Scannell on terms of deals announced on 9/9 (.3); analysis of stipulations on same (.4); correspondence with trustee on same (.3); call with trustee on same (.2); settlement conference with T. Scannell (.8); follow strategy conference with G. Milligan on same (.3); draft proposed settlement offer to Romspen (1.3); correspondence on same (.2)	5.80 hrs	560 /hr	3,248.00
09/11/2020	JMR	Correspondence with T. Scannell to advance plan negotiations, including status of Panache terms and related issues and scheduling (.5); correspondence with R. Horton on same (.3); strategy conferences (3) with G. Milligan on advancing resolution of all creditor claims (1.0); settlement conference with R. Horton (.2); strategy conference with T. Scannell (.3); anlaysis of options to advance leverage and plan terms (.8); correspondence with court on available date (.2); follow up settlement correspondence with T. Scannell (.3); follow up settlement conference with T. Scannell (.3)	3.90 hrs	560 /hr	2,184.00
09/13/2020	JMR	Correspondence with T. Scannell on status of negotiations (.6); Correspondence with G. Milligan on same (.4); review markup of settlement proposal from T. Scannell and begin comments on same (1.5); settlement status conference with T. Scannell (.4); settlement update and strategy call with G. Milligan (.4); settlement status call with R. Horton (.2); correspondence on same (.2)	3.20 hrs	560 /hr	1,792.00
09/14/2020	JMR	Correspondence with G. Milligan on update and next steps on plan negotiations (.3); correspondence with T. Scannell on same (.2); settlement conference with T. Scannell (.3);	0.80 hrs	560 /hr	448.00

			Page		2
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP			Invoice No:		127390
For Professional Services Rendered			Invoice through:		09/30/2020
09/16/2020	JMR	correspondence with R. Horton (.2) Strategy and update conference with R. Horton on Panache claim subordination negotiations and related issues (0.4); telephone conference with G. Milligan on same (.3)	0.70 hrs	560 /hr	392.00
09/17/2020	JMR	Correspondence with T. Scannell on plan negotiations (.2); telephone conferences (2) with G. Milligan on same (.5); analysis of plan options in regard to secured claim stipulations and escrows (.4)	1.10 hrs	560 /hr	616.00
09/19/2020	JMR	Settlement conference with T. Scannell to advance plan negotiations (.5); settlement conference with G. Milligan on same (.3); correspondence with T. Scannell and G. Milligan on advancing same (.5)	1.30 hrs	560 /hr	728.00
09/20/2020	JMR	Draft outline of Rompsen settlement options and deal terms in advance of settlement conference with T. Scannell on same (.7); correspondence with G. Milligan on same (.3); settlement conference with T. Scannell (.5); update correspondence with G. Milligan on same (.2); follow up settlement conference with T. Scannell (.7); strategy and update conference with Trustee (.4); final settlement conference (.3); correspondence on same (.2)	3.30 hrs	560 /hr	1,848.00
09/21/2020	JMR	Telephone conferences (2) with R. Horton on coordinating Panache claim treatment (.4); plan structure discussions with T. Scannell (.3); strategy conference with G. Milligan on options to advance plan based on status of negotiations with all parties (.5); draft and revise stipulation on escrow to advance plan negotiations with T. Scannell (1.5); trustee telephone conferences to negotiation and approve same (.6); settlement conference with T. Scannell on same (.2); finalize and file same (.2)	3.70 hrs	560 /hr	2,072.00
09/23/2020	JMR	Analysis of plan options post sale (.4); strategy calls (2) with Trustee on same (.4); settlement conference with R. Horton on same (.4)	1.20 hrs	560 /hr	672.00
09/24/2020	JMR	Plan settlement negotiations with Trustee, K. Mercer and R. Horton (.5); post conference strategy discussion with G. Milligan (.3); correspondence with T. Scannell on same (.2)	1.00 hrs	560 /hr	560.00
09/28/2020	JMR	Correspondence with G. Milligan regarding plan settlement structures based on updated status of case (0.4); strategy conference with T. Scannell to advance post-sale plan structure (.4); telephone conference with G. Milligan on same (.3); strategy conference with K. Mercer and R. Horton on same (.5); assessment of plan structure to advance drafting of same with S. Lawrence (.4); follow up strategy conference with T. Scannell (.3); assessment of options and next steps with G. Milligan (.3)	2.60 hrs	560 /hr	1,456.00
09/28/2020	SDL	Call with J. Rudd regarding disclosure statement and plan (.4); review various pleadings and documents related to case and relevant to disclosure statement and plan and correspondence to J. Rudd regarding same (1.5); review and revise disclosure statement (2.6); begin draft of plan (3.8).	8.30 hrs	420 /hr	3,486.00

			Page		3
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP			Invoice No:		127390
For Professional Services Rendered			Invoice through:		09/30/2020
09/29/2020	SDL	Continue revisions to plan.	3.90 hrs	420 /hr	1,638.00
09/29/2020	SDL	Call with Trustee, J. Rudd and E. White regarding plan and disclosure statement (.4); revisions to plan and disclosure statement ().	0.40 hrs	420 /hr	168.00
09/30/2020	JMR	Plan strategy and settlement conference calls (4) with G. Milligan (.4); plan settlement conference with R. Horton (.1); plan settlement and strategy call with K. Mercer, R. Horton and G. Milligan (.5); plan settlement and strategy call with A. Zarafshani, R. Horton, K. Mercer and G. Milligan (1.5); plan settlement conferences (3) with T. Scannell (.9); correspondence on plan terms (.5); advance incorporation of terms into draft plan with S. Lawrence (.3)	4.30 hrs	560 /hr	2,408.00
09/30/2020	SDL	Continue revisions to plan (7.6); call and correspondence with J. Rudd regarding same (.3).	7.90 hrs	420 /hr	3,318.00
Total fees for this matter			65.50 hrs		33,810.00

BILLING SUMMARY

TOTAL FEES	\$33,810.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	\$33,810.00
NET BALANCE FORWARD	\$9,177.06
TOTAL BALANCE NOW DUE	\$42,987.06

Timekeeper Summary

Name			Hours	Rate	Amount
Partner	JMR	Jason M Rudd	45.00	560.00	\$25,200.00
Associate	SDL	Scott D. Lawrence	20.50	420.00	\$8,610.00
			65.50		\$33,810.00

Required Notice to Clients.

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## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200 phone  
(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

October 7, 2020

Invoice No: 127391  
Our File No: 7066-20 JMR  
Billing through: 09/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Real Estate

TOTAL FEES	\$280.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$280.00
NET BALANCE FORWARD	\$672.00
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$952.00</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

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Federal Tax No. 45-4183914

October 7, 2020

Invoice No. 127391  
Reference No. 7066-20 JMR

Greg Milligan  
Attn: Gregory S. Milligan

Real Estate

### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122436	06/22/2020	20	JMR	\$1,008.00	\$201.60
124858	08/06/2020	20	JMR	\$728.00	\$145.60
126130	09/03/2020	20	JMR	\$1,624.00	\$324.80
Total Outstanding Balance					\$672.00
Total Amount Due on this Invoice					\$280.00
Total Balance Now Due					<u>\$952.00</u>

### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$0.00	\$324.80	\$145.60	\$201.60	\$0.00	\$672.00

Please remit payment within 30 days. Thank you!



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October 7, 2020

Invoice No: 127391  
Our File No: 7066-20 JMR  
Billing through: 09/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

Real Estate

Balance forward as of invoice dated 09/03/2020	\$1,971.20
Payments received since last invoice	\$1,299.20
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$672.00</u>
Trust balance carried forward	\$0.00

FOR PROFESSIONAL SERVICES RENDERED

09/15/2020	JMR	Conference call on advancement and strategy regarding PDA process with T. Irion and G. Milligan (.5)	0.50 hrs	560 /hr	280.00
Total fees for this matter			<u>0.50 hrs</u>		<u>280.00</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP	Page 1
For Professional Services Rendered	Invoice No: 127391
	Invoice through: 09/30/2020

**BILLING SUMMARY**

TOTAL FEES	\$280.00
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$280.00
NET BALANCE FORWARD	\$672.00
TOTAL BALANCE NOW DUE	\$952.00

**Timekeeper Summary**

Name	Hours	Rate	Amount
Partner JMR Jason M Rudd	0.50	560.00	\$280.00
	0.50		\$280.00

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Federal Tax No: 45-4183914

October 7, 2020

Invoice No: 127392  
Our File No: 7066-10 JMR  
Billing through: 09/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Claims Administration and Objections

TOTAL FEES	\$2,553.50
TOTAL DISBURSEMENTS	\$182.03
TOTAL CHARGES FOR THIS BILL	<hr/> \$2,735.53
NET BALANCE FORWARD	\$737.40
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$3,472.93</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP  
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## Wick Phillips Gould & Martin, LLP

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(214) 692-6255  
Federal Tax No. 45-4183914

October 7, 2020

Invoice No. 127392  
Reference No. 7066-10 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Claims Administration and Objections

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122444	06/22/2020	10	JMR	\$630.00	\$126.00
123581	07/06/2020	10	JMR	\$1,713.00	\$342.60
124867	08/06/2020	10	JMR	\$280.00	\$56.00
126140	09/03/2020	10	JMR	\$1,064.00	\$212.80
Total Outstanding Balance					\$737.40
Total Amount Due on this Invoice					\$2,735.53
Total Balance Now Due					\$3,472.93

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$0.00	\$212.80	\$56.00	\$468.60	\$0.00	\$737.40

Please remit payment within 30 days. Thank you!

Wick Phillips Gould & Martin, LLP

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Suite 500  
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(214) 692-6255  
Federal Tax ID: 45-4183914

October 7, 2020

Invoice No: 127392  
Our File No: 7066-10 JMR  
Billing through: 09/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

Claims Administration and Objections

Balance forward as of invoice dated 09/03/2020	\$1,588.60
Payments received since last invoice	\$851.20
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$737.40</u>
Trust balance carried forward	\$0.00

FOR PROFESSIONAL SERVICES RENDERED

09/01/2020	JMR	Portion of trustee team strategy call to advance assessment of claims, and related issues (.5); analysis of Schindler and Panache claim issues (.3); telephone conference with Panache regarding Summer Legacy (.2)	1.00 hrs	560 /hr	560.00
09/04/2020	JMR	Strategy conference with P. Cannon and S. Lawrence regarding analysis of Panache claims and general contractor and related subcontractor claims and treatment issues (.3)	0.30 hrs	560 /hr	168.00
09/04/2020	PCC	Telephone conference with J. Rudd and S. Lawrence regarding subcontractor claim research; conduct legal research and analysis regarding same; correspondence to J. Rudd and S. Lawrence regarding initial results.	3.90 hrs	425 /hr	1,657.50
09/25/2020	JMR	Correspondence with T. Scannell regarding analysis of unsecured claims (.3)	0.30 hrs	560 /hr	168.00
Total fees for this matter			<u>5.50 hrs</u>		<u>2,553.50</u>

DISBURSEMENTS

09/30/2020	Thomson Reuters-West - Online Research	182.03
Total disbursements for this matter		<u>\$182.03</u>

Greg Milligan as proposed ch 11 trustee of  
3443 Zen Garden LP  
For Professional Services Rendered

Page 1  
Invoice No: 127392  
Invoice through: 09/30/2020

**BILLING SUMMARY**

TOTAL FEES	\$2,553.50
TOTAL DISBURSEMENTS	\$182.03
TOTAL CHARGES FOR THIS BILL	\$2,735.53
NET BALANCE FORWARD	\$737.40
TOTAL BALANCE NOW DUE	\$3,472.93

**Timekeeper Summary**

Name		Hours	Rate	Amount
Partner	JMR Jason M Rudd	1.60	560.00	\$896.00
Of Counsel	PCC Patrick C. Canon	3.90	425.00	\$1,657.50
		5.50		\$2,553.50

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Federal Tax No: 45-4183914

October 7, 2020

Invoice No: 127393  
Our File No: 7066-14 JMR  
Billing through: 09/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Employment and Fee Application Objections

TOTAL FEES	\$1,456.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$1,456.00
NET BALANCE FORWARD	\$280.00
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$1,736.00</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

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Federal Tax No. 45-4183914

October 7, 2020

Invoice No. 127393  
Reference No. 7066-14 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Employment and Fee Application Objections

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
123579	07/06/2020	14	JMR	\$840.00	\$168.00
124869	08/06/2020	14	JMR	\$336.00	\$67.20
126134	09/03/2020	14	JMR	\$224.00	\$44.80
Total Outstanding Balance					\$280.00
Total Amount Due on this Invoice					\$1,456.00
Total Balance Now Due					<u>\$1,736.00</u>

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$0.00	\$44.80	\$67.20	\$168.00	\$0.00	\$280.00

Please remit payment within 30 days. Thank you!



Wick Phillips Gould & Martin, LLP

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Federal Tax ID: 45-4183914

October 7, 2020

Invoice No: 127393  
Our File No: 7066-14 JMR  
Billing through: 09/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

Employment and Fee Application Objections

Balance forward as of invoice dated 09/03/2020	\$459.20
Payments received since last invoice	\$179.20
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$280.00</u>
Trust balance carried forward	\$0.00

FOR PROFESSIONAL SERVICES RENDERED

09/07/2020	JMR	Analysis of Romspen objection to receivers' fee application and related admin claim motion (.2); correspondence with trustee team on same (.1)	0.30 hrs	560 /hr	168.00
09/11/2020	JMR	Analysis of and comment on proposed receiver and Winstead admin claim allowance order (.3); correspondence on same (.3)	0.60 hrs	560 /hr	336.00
09/13/2020	JMR	Correspondence with G. Milligan regarding receiver fee order comments (.2); portion of call with T. Scannell on same (.1)	0.30 hrs	560 /hr	168.00
09/14/2020	JMR	Settlement and prehearing conference with receivers' counsel and T. Scannell to advance discussions and coordinate hearing (.4); appear for and argue trustee position at hearing on receiver fee application and Romspen objection to same (.6); post hearing conference with G. Milligan (.2); review and approve draft order conformed to rulings on same (.2)	1.40 hrs	560 /hr	784.00
Total fees for this matter			<u>2.60 hrs</u>		<u>1,456.00</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 1 Invoice No: 127393 Invoice through: 09/30/2020
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**BILLING SUMMARY**

TOTAL FEES	\$1,456.00
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$1,456.00
NET BALANCE FORWARD	\$280.00
TOTAL BALANCE NOW DUE	\$1,736.00

Timekeeper Summary

Name	Hours	Rate	Amount
Partner JMR Jason M Rudd	2.60	560.00	\$1,456.00
	2.60		\$1,456.00

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October 7, 2020

Invoice No: 127394  
Our File No: 7066-09 JMR  
Billing through: 09/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Case Administration

TOTAL FEES	\$676.50
TOTAL DISBURSEMENTS	\$156.75
TOTAL CHARGES FOR THIS BILL	<hr/> \$833.25
NET BALANCE FORWARD	\$705.20
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$1,538.45</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

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Federal Tax No. 45-4183914

October 7, 2020

Invoice No. 127394  
Reference No. 7066-09 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Case Administration

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122445	06/22/2020	09	JMR	\$2,688.00	\$537.60
123576	07/06/2020	09	JMR	\$532.00	\$106.40
124862	08/06/2020	09	JMR	\$108.00	\$21.60
126137	09/03/2020	09	JMR	\$512.50	\$39.60
Total Outstanding Balance					\$705.20
Total Amount Due on this Invoice					\$833.25
Total Balance Now Due					\$1,538.45

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$0.00	\$39.60	\$21.60	\$644.00	\$0.00	\$705.20

Please remit payment within 30 days. Thank you!

Wick Phillips Gould & Martin, LLP

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(214) 692-6255  
Federal Tax ID: 45-4183914

October 7, 2020

Invoice No: 127394  
Our File No: 7066-09 JMR  
Billing through: 09/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

Case Administration

Balance forward as of invoice dated 09/03/2020	\$1,178.10
Payments received since last invoice	\$472.90
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$705.20</u>
Trust balance carried forward	\$0.00

FOR PROFESSIONAL SERVICES RENDERED

09/15/2020	BR	Prepare emergency hearing request.	0.50 hrs	165 /hr	82.50
09/16/2020	BR	Prepare certificate of service and notice of hearing; file and serve re same.	1.70 hrs	165 /hr	280.50
09/18/2020	BR	Prepare exhibits for 9/23 hearing.	0.40 hrs	165 /hr	66.00
09/22/2020	BR	Prepare amended witness and exhibit list; file re same.	0.60 hrs	165 /hr	99.00
09/23/2020	BR	Prepare notice of withdrawal.	0.40 hrs	165 /hr	66.00
09/28/2020	BR	Finalize proposed stipulation; file re same.	0.20 hrs	165 /hr	33.00
09/30/2020	BR	Prepare witness and exhibit list.	0.30 hrs	165 /hr	49.50
Total fees for this matter			4.10 hrs		<u>676.50</u>

DISBURSEMENTS

09/15/2020	Postage. (BR)	35.75
09/15/2020	Copies (BR)	121.00
Total disbursements for this matter		<u>\$156.75</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 1 Invoice No: 127394 Invoice through: 09/30/2020
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**BILLING SUMMARY**

TOTAL FEES	\$676.50
TOTAL DISBURSEMENTS	\$156.75
TOTAL CHARGES FOR THIS BILL	\$833.25
NET BALANCE FORWARD	\$705.20
TOTAL BALANCE NOW DUE	\$1,538.45

**Timekeeper Summary**

Name	Hours	Rate	Amount
Legal BR Brenda Ramirez	4.10	165.00	\$676.50
Assistant	4.10		\$676.50

**Required Notice to Clients.**

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October 7, 2020

Invoice No: 127395  
Our File No: 7066-22 JMR  
Billing through: 09/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Reporting

TOTAL FEES	\$1,934.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$1,934.00
NET BALANCE FORWARD	\$1,443.90
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$3,377.90</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP  
Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax No. 45-4183914

October 7, 2020

Invoice No. 127395  
Reference No. 7066-22 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Reporting

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122442	06/22/2020	22	JMR	\$6,659.50	\$1,331.90
123570	07/06/2020	22	JMR	\$168.00	\$33.60
124856	08/06/2020	22	JMR	\$224.00	\$44.80
126127	09/03/2020	22	JMR	\$168.00	\$33.60
Total Outstanding Balance					\$1,443.90
Total Amount Due on this Invoice					\$1,934.00
Total Balance Now Due					\$3,377.90

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$0.00	\$33.60	\$44.80	\$1,365.50	\$0.00	\$1,443.90

Please remit payment within 30 days. Thank you!



Wick Phillips Gould & Martin, LLP

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Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

October 7, 2020

Invoice No: 127395  
Our File No: 7066-22 JMR  
Billing through: 09/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

Reporting

Balance forward as of invoice dated 09/03/2020	\$1,578.30
Payments received since last invoice	\$134.40
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$1,443.90</u>
Trust balance carried forward	\$0.00

FOR PROFESSIONAL SERVICES RENDERED

09/18/2020	JMR	Review, finalize and file MOR (.3)	0.30 hrs	560 /hr	168.00
09/24/2020	JMR	Analysis of budget variance and approve same (.2)	0.20 hrs	560 /hr	112.00
09/25/2020	JMR	Approve and serve budget variance reporting to T. Scannell (.2)	0.20 hrs	560 /hr	112.00
09/29/2020	SDL	Call and correspondence with D. Heringer regarding Trustee's final report (.1); research forms of same (.3).	0.40 hrs	420 /hr	168.00
09/30/2020	DGJ	Pursue strategy re. final report (0.4); prepare final report (3.2)	3.60 hrs	335 /hr	1,206.00
09/30/2020	SDL	Call, correspondence and meeting with D. Heringer regarding draft of Trustee's final report.	0.40 hrs	420 /hr	168.00
Total fees for this matter			<u>5.10 hrs</u>		<u>1,934.00</u>

Greg Milligan as proposed ch 11 trustee of  
3443 Zen Garden LP  
For Professional Services Rendered

Page 1  
Invoice No: 127395  
Invoice through: 09/30/2020

**BILLING SUMMARY**

TOTAL FEES	\$1,934.00
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$1,934.00
NET BALANCE FORWARD	\$1,443.90
TOTAL BALANCE NOW DUE	\$3,377.90

Timekeeper Summary

Name			Hours	Rate	Amount
Associate	DGJ	Daniella G. Heringer	3.60	335.00	\$1,206.00
Partner	JMR	Jason M Rudd	0.70	560.00	\$392.00
Associate	SDL	Scott D. Lawrence	0.80	420.00	\$336.00
			5.10		\$1,934.00

Required Notice to Clients.

THE STATE BAR OF TEXAS INVESTIGATES AND PROSECUTES PROFESSIONAL MISCONDUCT COMMITTED BY TEXAS ATTORNEYS. ALTHOUGH NOT EVERY COMPLAINT AGAINST OR DISPUTE WITH A LAWYER INVOLVES PROFESSIONAL MISCONDUCT, THE STATE BAR'S OFFICE OR GENERAL COUNSEL WILL PROVIDE YOU WITH INFORMATION ABOUT HOW TO FILE A COMPLAINT. PLEASE CALL 1-800-932-1900 TOLL-FREE FOR MORE INFORMATION.

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(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

October 7, 2020

Invoice No: 127396  
Our File No: 7066-07 JMR  
Billing through: 09/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Budgeting (Case)

TOTAL FEES	\$392.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$392.00
NET BALANCE FORWARD	\$30.00
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$422.00</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

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Suite 500  
Dallas, TX 75204  
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(214) 692-6255  
Federal Tax No. 45-4183914

October 7, 2020

Invoice No. 127396  
Reference No. 7066-07 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Budgeting (Case)

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122447	06/22/2020	07	JMR	\$84.00	\$16.80
124860	08/06/2020	07	JMR	\$66.00	\$13.20
Total Outstanding Balance					\$30.00
Total Amount Due on this Invoice					\$392.00
Total Balance Now Due					\$422.00

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$0.00	\$0.00	\$13.20	\$16.80	\$0.00	\$30.00

Please remit payment within 30 days. Thank you!

**Wick Phillips Gould & Martin, LLP**

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(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

October 7, 2020

Invoice No: 127396  
Our File No: 7066-07 JMR  
Billing through: 09/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Budgeting (Case)**

Balance forward as of invoice dated 08/06/2020	\$82.80
Payments received since last invoice	\$52.80
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$30.00</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

09/01/2020	JMR	Analysis and comment on attorney fee case budget to Trustee (.4)	0.40 hrs	560 /hr	224.00
09/06/2020	JMR	Analysis of professional fee budgets to ensure compliance with same (.3)	0.30 hrs	560 /hr	168.00
Total fees for this matter			<u>0.70 hrs</u>		<u>392.00</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP	Page 1
For Professional Services Rendered	Invoice No: 127396
	Invoice through: 09/30/2020

**BILLING SUMMARY**

TOTAL FEES	\$392.00
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$392.00
NET BALANCE FORWARD	\$30.00
TOTAL BALANCE NOW DUE	\$422.00

**Timekeeper Summary**

Name	Hours	Rate	Amount
Partner JMR Jason M Rudd	0.70	560.00	\$392.00
	0.70		\$392.00

**Required Notice to Clients.**

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Federal Tax No: 45-4183914

October 7, 2020

Invoice No: 127397  
Our File No: 7066-05 JMR  
Billing through: 09/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Assumption and Rejection of Leases and Contracts

TOTAL FEES	\$5,068.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$5,068.00
NET BALANCE FORWARD	\$182.00
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$5,250.00</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

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Suite 500  
Dallas, TX 75204  
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(214) 692-6255  
Federal Tax No. 45-4183914

October 7, 2020

Invoice No. 127397  
Reference No. 7066-05 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Assumption and Rejection of Leases and Contracts

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
124873	08/06/2020	05	JMR	\$42.00	\$8.40
126135	09/03/2020	05	JMR	\$868.00	\$173.60
Total Outstanding Balance					\$182.00
Total Amount Due on this Invoice					\$5,068.00
Total Balance Now Due					\$5,250.00

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$0.00	\$173.60	\$8.40	\$0.00	\$0.00	\$182.00

Please remit payment within 30 days. Thank you!



**Wick Phillips Gould & Martin, LLP**

3131 McKinney Avenue  
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Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

October 7, 2020

Invoice No: 127397  
Our File No: 7066-05 JMR  
Billing through: 09/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Assumption and Rejection of Leases and Contracts**

Balance forward as of invoice dated 09/03/2020	\$876.40
Payments received since last invoice	\$694.40
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$182.00</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

09/01/2020	SDL	Call with J. Rudd, E. White and Trustee regarding cure costs related to sale of property (.4); call with E. White and Panache representatives to discuss same and follow up calls and correspondence with E. White regarding same (1.6).	2.00 hrs	420 /hr	840.00
09/02/2020	SDL	Call with J. Rudd, E. White, and Trustee regarding assumption and cure costs call.	0.20 hrs	420 /hr	84.00
09/04/2020	SDL	Call with P. Canon & J. Rudd regarding cure costs and research questions related thereto (.4); correspondence to R. Horton requesting documents to back up cure calculation (.1); review research memo from P. Canon (.2); multiple correspondences with E. White regarding cure cost backup documentation from Panache and review of same (.4).	1.10 hrs	420 /hr	462.00
09/07/2020	JMR	Correspondence with E. White and trustee team regarding potential cure claims for data room (.2); analysis of S. Lawrence comments on same (.2); correspondence with R. Horton on same (.1)	0.50 hrs	560 /hr	280.00
09/08/2020	JMR	Strategy conferences (2) with Trustee team to advance cure claim calculation and notice for Panache contract (1.1); analysis of reports from E. White on same (.4); revisions to cure claim notice (.3)	1.80 hrs	560 /hr	1,008.00
09/08/2020	SDL	Draft Notice of Proposed Cure Amounts and circulate (.8); call with J. Rudd, E. White and Trustee regarding cure costs, status, and next steps (.2); call with same group to finalize cure position (.9); revisions to cure notice and finalize (1.1);	3.20 hrs	420 /hr	1,344.00

				Page	1
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP				Invoice No:	127397
For Professional Services Rendered				Invoice through:	09/30/2020
		correspondence with R. Horton regarding cure notice (.1); additional correspondence with E. White and Trustee regarding same (.1).			
09/09/2020	SDL	Call with E. White, J. Rudd and Trustee regarding cure notice, next steps, and negotiations with Panache regarding same.	0.20 hrs	420 /hr	84.00
09/16/2020	SDL	Call with R. Horton and J. Rudd regarding Panache contract.	0.20 hrs	420 /hr	84.00
09/17/2020	SDL	Call with J. Rudd and E. White to discuss Panache cure claim.	0.20 hrs	420 /hr	84.00
09/18/2020	SDL	Call with E. White to discuss Panache cure amount and remaining disputes related thereto.	0.70 hrs	420 /hr	294.00
09/22/2020	SDL	Call with Trustee, J. Rudd and E. White regarding Panache cure claim (.5); draft email to M. Farooq regarding same (.5); additional correspondence regarding same (.2).	1.20 hrs	420 /hr	504.00
Total fees for this matter			11.30 hrs		5,068.00

BILLING SUMMARY

TOTAL FEES	\$5,068.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	\$5,068.00
NET BALANCE FORWARD	\$182.00
TOTAL BALANCE NOW DUE	\$5,250.00

Timekeeper Summary

Name			Hours	Rate	Amount
Partner	JMR	Jason M Rudd	2.30	560.00	\$1,288.00
Associate	SDL	Scott D. Lawrence	9.00	420.00	\$3,780.00
			11.30		\$5,068.00

Required Notice to Clients.

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## Wick Phillips Gould & Martin, LLP

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Suite 500  
Dallas, TX 75204  
(214) 692-6200 phone  
(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

October 7, 2020

Invoice No: 127398  
Our File No: 7066-04 JMR  
Billing through: 09/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Asset Disposition

TOTAL FEES	\$44,507.50
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$44,507.50
NET BALANCE FORWARD	\$8,325.20
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$52,832.70</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax No. 45-4183914

October 7, 2020

Invoice No. 127398.1  
Reference No. 7066-04 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Asset Disposition

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122448	06/22/2020	04	JMR	\$3,370.00	\$674.00
123574	07/06/2020	04	JMR	\$7,966.00	\$1,593.20
124866	08/06/2020	04	JMR	\$7,938.00	\$1,587.60
126133	09/03/2020	04	JMR	\$22,578.17	\$4,470.40
Total Outstanding Balance					\$8,325.20
Total Amount Due on this Invoice					\$44,507.50
Total Balance Now Due					\$52,832.70

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$0.00	\$4,470.40	\$1,587.60	\$2,267.20	\$0.00	\$8,325.20

Please remit payment within 30 days. Thank you!

Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
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Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

October 7, 2020

Invoice No: 127398  
Our File No: 7066-04 JMR  
Billing through: 09/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

Asset Disposition

Balance forward as of invoice dated 09/03/2020	\$26,432.97
Payments received since last invoice	\$18,107.77
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$8,325.20</u>
Trust balance carried forward	\$0.00

FOR PROFESSIONAL SERVICES RENDERED

09/01/2020	JMD	Review comments to draft asset purchase agreement from Scott Lawrence and Jason Rudd; conference call with Scott Lawrence and Jason Rudd regarding same; revise asset purchase agreement based on feedback from call and based on precedent materials provided by Scott Lawrence; coordinate with Anna Blair regarding purchase price allocation matters in the asset purchase agreement; coordinate with Ryan Goins regarding real estate matters in the asset purchase agreement	4.10 hrs	515 /hr	2,111.50
09/01/2020	JMR	Portion of trustee team strategy call to advance sales process, due diligence and bid procedures implementation (.5); review and revise APA for data room pursuant to bid procedures (.9); analysis conference with J. Dalton and S. Lawrence (.5)	1.90 hrs	560 /hr	1,064.00
09/01/2020	RAG	Conduct preliminary review of draft Asset Purchase Agreement.	0.30 hrs	475 /hr	142.50
09/01/2020	SDL	Call with J. Rudd, E. White and Trustee to discuss progress with APA, potential designation of stalking horse bidder, and conversations with prior title company (.3); review and revise form of asset purchase agreement (.8); call with prior title company representative regarding additional documents (.2); call with J. Dalton and J. Rudd to discuss same (.5); research forms of APA used in other cases and memo to J. Rudd and J. Dalton regarding same (1.4).	3.20 hrs	420 /hr	1,344.00
09/02/2020	JMD	Coordinate with Ryan Goins and Scott Lawrence regarding real estate matters in the asset purchase	0.60 hrs	515 /hr	309.00

			Page	1	
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP			Invoice No:	127398	
For Professional Services Rendered			Invoice through:	09/30/2020	
		agreement; review Ryan Goins' comments to draft asset purchase agreement			
09/02/2020	RAG	Call with S. Lawrence regarding case history and project time line (0.5); review draft asset purchase agreement (0.5); research regarding bankruptcy treatment of title matters (0.4); revise and edit asset purchase agreement (1.1); call with real estate section leadership regarding real estate strategy for bankruptcy sales process (0.2).	2.70 hrs	475 /hr	1,282.50
09/02/2020	SDL	Call with J. Rudd, E. White and Trustee to update marketing process (.2); review of documents and correspondence to J. Dalton and R. Goins regarding schedules to APA (.5); call to R. Goins regarding revisions to APA (.5); review revisions (.3).	1.50 hrs	420 /hr	630.00
09/03/2020	JMD	Review and revise asset purchase agreement based on feedback received from Ryan Goins, Anna Blair, and Jason Rudd	1.60 hrs	515 /hr	824.00
09/04/2020	JMR	Analysis of and response to Trustee questions on press coverage of sale and related bidding and marketing issues (.4); extensive revisions to draft from APA (.9); correspondence on access agreement (.2)	1.50 hrs	560 /hr	840.00
09/07/2020	SDL	Review proposed access easement and correspondence with Trustee regarding same.	0.20 hrs	420 /hr	84.00
09/08/2020	JMD	Review and revise asset purchase agreement based on feedback received from Jason Rudd and Greg Milligan	2.10 hrs	515 /hr	1,081.50
09/08/2020	JMR	Analysis, review and revise form APA for due diligence data room (1.8); correspondence with G. Milligan and trustee team on same (.3); follow up revisions and updates on same (.3); correspondence with brokers on same (.2)	2.60 hrs	560 /hr	1,456.00
09/09/2020	JMR	Analysis of updated vendor and related due diligence documents and approval for data room (0.3); review and revise comments on responses to due diligence and press inquires (0.3); correspondence with Trustee on same (.2)	0.80 hrs	560 /hr	448.00
09/09/2020	SDL	Call with J. Rudd, E. White and Trustee regarding APA, revisions thereto, and follow up correspondence, including regarding property condition report and environmental report.	0.40 hrs	420 /hr	168.00
09/10/2020	SDL	Call and correspondence with Trustee regarding non-disclosure agreement (.2); review of same (.3); call with M. O'Toole regarding CTRMA settlement agreement (.2).	0.70 hrs	420 /hr	294.00
09/14/2020	JMR	Correspondence with D. Rushing (D. White counsel) regarding data room access and related (.3); advance related potential bidder and auction preparations (.8); correspondence with trustee team on same (.4); analysis of Panache stipulation on challenge resolution (.2); correspondence with trustee on same (.2)	1.90 hrs	560 /hr	1,064.00
09/14/2020	SDL	Correspondence, calls, and review of documents related to request from Dan White parties for access to the marketing data room.	0.50 hrs	420 /hr	210.00
09/16/2020	SDL	Correspondence and calls with J. Rudd and B.	0.60 hrs	420 /hr	252.00

		Page		2	
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP		Invoice No:		127398	
For Professional Services Rendered		Invoice through:		09/30/2020	
	Ramirez regarding credit bid limitation motion and various service issues related to same (.2); review and revise certificate of service and notice of hearing (.1) call with J. Rudd and N. Nelson regarding credit bid limitation issues (.3).				
09/17/2020	JMR	Conference with D. White counsel and business team to advance bidding at auction (.6); analysis of updated and revised stipulations filed in advance of hearing (.3); correspondence with court on hearing reset (.1); appear for hearing on stipulations (1.0); strategy conference with Trustee team on same (.5); conference call with G. Milligan on status of bids and planning to address same (.3); conference call with T. Scannell to advance sale process (.5)	3.30 hrs	560 /hr	1,848.00
09/17/2020	SDL	Calls and correspondence regarding preparation for hearing to limit credit bid and bid procedures deadlines.	0.50 hrs	420 /hr	210.00
09/18/2020	JMR	Strategy conference with K. Mercer on status of stipulations, next steps in case sale process (.3); strategy conference with G. Milligan on same (.3); correspondence with T. Scannell on same (0.2); correspondence with G. Milligan with next steps (0.3); analysis of sale objections from D. White, Scheindler, Panache (.4); strategy conference with G. Milligan and Trustee team on assessment and response to same (0.4); correspondence regarding D. White inquires on information for bid and related requests (.2)	2.10 hrs	560 /hr	1,176.00
09/19/2020	JMR	Correspondence with D. Williamson responding to questions on bidding and auction and related issues (.4); correspondence with trustee and trustee team on same (.3)	0.70 hrs	560 /hr	392.00
09/20/2020	JMR	Bid and sale conference with D. Williamson regarding advancing D. White bid at auction (.4); correspondence with Trustee team on same (.2)	0.60 hrs	560 /hr	336.00
09/22/2020	JMR	Telephone conference with D. White Canada counsel at Dentons regarding escrow for bid (0.3); correspondence with G. Milligan and Cushman team on same (0.2); telephone conferences (2) with T. Scannell on Credit Bid Deposit and related auction items (.4); coordinate witness and exhibits for stipulation hearing (.6); strategy conference with Trustee team on same (.5); strategy conference with T. Scannell on same (.3); finalize and file stipulation (.5); correspondence with court on same (.3); correspondence with D. Williamson on same (.3); draft outline of G. Milligan direct and cross on stipulation approval (.8); preparation with G. Milligan on same (.4); finalize exhibits for stipulation hearing (.5);	5.10 hrs	560 /hr	2,856.00
09/22/2020	NBN	Attend strategy call with J. Rudd and client regarding next steps.	0.80 hrs	495 /hr	396.00
09/22/2020	SDL	Call with Trustee, J. Rudd and E. White regarding credit bid escrow stipulation and anticipated opposition from D. White (.4); review and revise hearing outline for same (.3).	0.70 hrs	420 /hr	294.00
09/23/2020	JMR	Correspondence with J. Hillson at Dentons	4.40 hrs	560 /hr	2,464.00

		Page		3	
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP		Invoice No:		127398	
For Professional Services Rendered		Invoice through:		09/30/2020	
	regarding bidder deposit information (.3); strategy conference with T. Scannell to advance sale hearing preparations (.3); strategy conference with R. Horton on same (.3); appear for hearing on stipulation for deposit (1.0); preparation of arguments and response to D. White comments on same (1.2); strategy conference with G. Milligan and trustee team on same (.4); upload order on stipulation approval (.1); correspondence with court on same (.1); correspondence with T. Scannell on deposit of funds per same (.2); conference with potential host for virtual auction(.3); correspondence on same (.2)				
09/23/2020	JMR	Conference on auction structure, vendor options and planning (.3); correspondnce with vendors and trustee team on same (.4)	0.70 hrs	560 /hr	392.00
09/23/2020	SDL	Correspondence with broker regarding potential purchaser inquiries (.2); call with Trustee and J. Rudd regarding credit bid escrow stipulation hearing (.3); additional correspondence with Trustee and broker regarding purchaser inquiries related to form of bids and required information (.9); begin draft of confidentiality agreement in response to potential purchaser inquiry (1.1); correspondence regarding same (.2); draft proposed schedules to asset purchase agreement (1.8).	4.50 hrs	420 /hr	1,890.00
09/24/2020	JMR	Sale and auction planning conference with Trustee team (.5); correspondence on last minute requests for NDAs with potential buyers (.8); correspondence on form sale order (.3); strategy call with Trustee team to advance preparations on sale hearing and process(.5); correspondence on deposit wires (.4); related sale preparations and correspondence (.5)	3.00 hrs	560 /hr	1,680.00
09/24/2020	SDL	Call with Trustee, J. Rudd and E. White regarding sale process and status (.2); revisions to proposed confidentiality agreement with D. White parties (1.3); calls and correspondences with Trustee and J. Rudd regarding same (.8); call with D. Williamson regarding same (.1); additional correspondence with D. Williamson, J. Rudd and Trustee regarding same (.5); correspondence with potential purchasers regarding additional inquiries (.3); begin draft of proposed sale order (2.1); correspondence with J. Rudd and broker regarding preparation for sale hearing (.1).	5.40 hrs	420 /hr	2,268.00
09/25/2020	JMR	Telephone conference with T. Scannell regarding status of bids and addressing credit bid on same (.3); finalize and file withdraw (.2); revisions to draft sale order to advance bid process (.8); extensive correspondence with Cushman, Trustee and bidders regarding last minute due diligence requests and process questions, including insurance, tax assessment and related bid matters (1.3); bidding update calls (2) with G. Milligan (.4); trustee team bid conclusion call (.4); correspondence with T.Scannell on credit bid (.4); telephone conference on same (.2); follow up call with Trustee on same (.3); preparations for next steps in auction and sale	5.20 hrs	560 /hr	2,912.00



			Page		4
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP			Invoice No:		127398
For Professional Services Rendered			Invoice through:		09/30/2020
		process (.9)			
09/25/2020	SDL	Additional drafting and revisions to proposed sale order (2.4); review bid package submitted by D. White (.4); revise notice of withdrawal of credit bid challenge in connection with stipulation (.1); call with Trustee and J. Rudd regarding bids and next steps (.2).	3.10 hrs	420 /hr	1,302.00
09/26/2020	JMR	Revisions to sale order (.7); correspondence with White bidder regarding designation of initial bid, auction process, supplemental financial (.8); analysis of bid procedures to inform same (.2); correspondence with Romspen regarding contract assumption (.2); strategy correspondence with G. Milligan on same (.2)	2.10 hrs	560 /hr	1,176.00
09/26/2020	SDL	Revisions to sale order and correspondence to J. Rudd regarding same.	2.70 hrs	420 /hr	1,134.00
09/27/2020	JMR	Prepare and serve notice of auction on bidders (.7); respond to questions on same (.3); further revision to same order (0.3); correspondence with T. Scannell and W. Roitman (.2); correspondence with auction host regarding attendees and related logistics (0.7)	2.20 hrs	560 /hr	1,232.00
09/27/2020	NBN	Correspond with counsel to respond to questions raised about case.	1.50 hrs	495 /hr	742.50
09/28/2020	JMR	Correspondence to finalize auction hosting and procedures with vendors and bidders (.7); correspondence with 228 Alberta representatives to follow up on topping bid requirements and financial support needed for same (.6); analysis of new bid package from 228 Alberta counsel (.4); correspondence with G. Milligan on same (.2); auction planning correspondence with G. Milligan (.3); follow up correspondence with auction coordination (.2)	2.40 hrs	560 /hr	1,344.00
09/29/2020	JMR	Outline points and presentation to lead auction, including addressing Initial Bid, Minimum Topping Bid, Qualified bidder affirmations and related issues spotting and preparations (1.0); telephone conference and correspondence with 228 Alberta counsel on Zoom instructions (.3); pre-auction conference call with G. Milligan and trustee team to address auction process, planning and finalize decision making (.5); appear for and conduct auction (.9); post-auction next steps strategy call with G. Milligan and trustee team (.5); telephone conference with G. Milligan regarding motion to estimate and sale hearing (.3); post-auction conference with T. Scannell on next steps in sales process (.5); follow up conference call with K. Mercer on same (.3)	4.30 hrs	560 /hr	2,408.00
09/29/2020	SDL	Preparation for auction, including calls and correspondence related thereto (1.0); dial into and support J. Rudd during auction (.5); follow up call regarding next steps with J. Rudd, Trustee and E. White (.5); correspondence with T. Scannell regarding sale hearing (.1).	2.10 hrs	420 /hr	882.00
09/30/2020	JMR	Analysis of Romspen bid estimation motion and	2.20 hrs	560 /hr	1,232.00

Greg Milligan as proposed ch 11 trustee of  
3443 Zen Garden LP  
For Professional Services Rendered

Page 5  
Invoice No: 127398  
Invoice through: 09/30/2020

	White objection to expedited hearing and related court order on same (.5); strategy conference with T. Scannell on same (.3); correspondence on sale hearing preparations, including witness and exhibit list (.5); analysis of transcript from auction (.3); review Romspen exhibits (.3); correspondence with Trustee on press inquiries (.3)			
09/30/2020	SDL	Begin revisions to sale order to incorporate results of auction.	0.80 hrs	420 /hr 336.00
Total fees for this matter			87.60 hrs	44,507.50

**BILLING SUMMARY**

TOTAL FEES	\$44,507.50
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	\$44,507.50
NET BALANCE FORWARD	\$8,325.20
TOTAL BALANCE NOW DUE	\$52,832.70

**Timekeeper Summary**

Name			Hours	Rate	Amount
Partner	JMD	Jeffrey M. Dalton	8.40	515.00	\$4,326.00
Partner	JMR	Jason M Rudd	47.00	560.00	\$26,320.00
Partner	NBN	Nick B. Nelson	2.30	495.00	\$1,138.50
Associate	RAG	Ryan A. Goins	3.00	475.00	\$1,425.00
Associate	SDL	Scott D. Lawrence	26.90	420.00	\$11,298.00
			87.60		\$44,507.50

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## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200 phone  
(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

October 7, 2020

Invoice No: 127399  
Our File No: 7066-03 JMR  
Billing through: 09/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Asset Analysis and Recovery

TOTAL FEES	\$5,728.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$5,728.00
NET BALANCE FORWARD	\$5,134.20
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$10,862.20</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

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(214) 692-6255  
Federal Tax No. 45-4183914

October 7, 2020

Invoice No. 127399.1  
Reference No. 7066-03 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Asset Analysis and Recovery

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122449	06/22/2020	03	JMR	\$13,166.00	\$2,633.20
123572	07/06/2020	03	JMR	\$4,118.50	\$823.70
124863	08/06/2020	03	JMR	\$1,097.85	\$213.20
126132	09/03/2020	03	JMR	\$7,320.50	\$1,464.10
Total Outstanding Balance					\$5,134.20
Total Amount Due on this Invoice					\$5,728.00
Total Balance Now Due					\$10,862.20

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$0.00	\$1,464.10	\$213.20	\$3,456.90	\$0.00	\$5,134.20

Please remit payment within 30 days. Thank you!

**Wick Phillips Gould & Martin, LLP**

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(214) 692-6200  
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Federal Tax ID: 45-4183914

October 7, 2020

Invoice No: 127399  
Our File No: 7066-03 JMR  
Billing through: 09/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Asset Analysis and Recovery**

Balance forward as of invoice dated 09/03/2020	\$10,990.60
Payments received since last invoice	\$5,856.40
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$5,134.20</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

09/01/2020	NBN	Follow up with Hinshaw regarding status of document production.	0.30 hrs	495 /hr	148.50
09/02/2020	NBN	Prepare for and attend call with trustee regarding case strategy; multiple emails with Hinshaw regarding status of document production.	1.50 hrs	495 /hr	742.50
09/02/2020	SDL	Call with N. Nelson, J. Rudd, E. White & Trustee regarding status of records requests.	0.40 hrs	420 /hr	168.00
09/03/2020	NBN	Correspond with Hinshaw regarding document production issues and whether proper notice was provided to interested parties; prepare subpoena.	1.20 hrs	495 /hr	594.00
09/03/2020	SDL	Correspondence to N. Nelson regarding Motion to Compel (.8); call regarding same (.2).	1.00 hrs	420 /hr	420.00
09/04/2020	JMR	Correspondence with R. Horton regarding Panache document requests and production (.3); correspondence with Hinshaw on turnover of files (.3)	0.60 hrs	560 /hr	336.00
09/07/2020	JMR	Correspondence with data vendors and Trustee on turnover of debtors' legal files and response to questions on coordination for review of same (.3)	0.30 hrs	560 /hr	168.00
09/08/2020	NBN	Correspond with R. Horton regarding subpoena to obtain debtor's records and files.	0.60 hrs	495 /hr	297.00
09/21/2020	JMR	Correspondence with D. Williamson regarding disposition of tenant deposits to advance potential recovery on same (.3); correspondence with G. Milligan on same (.2)	0.50 hrs	560 /hr	280.00
09/28/2020	NBN	Prepare deposition notice to advance collection of debtor's records.	1.20 hrs	495 /hr	594.00
09/29/2020	NBN	Prepare strategy and analysis of legal files on all	1.50 hrs	495 /hr	742.50

				Page	1
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP				Invoice No:	127399
For Professional Services Rendered				Invoice through:	09/30/2020
<hr/>					
09/30/2020	NBN	potential debtor litigation assets. Attend calls with client and A. Zarafshani; review correspondence regarding analysis and collection of support for estate claim assets and assessment of same.	2.50 hrs	495 /hr	1,237.50
Total fees for this matter			11.60 hrs		5,728.00

BILLING SUMMARY

TOTAL FEES	\$5,728.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	\$5,728.00
NET BALANCE FORWARD	\$5,134.20
TOTAL BALANCE NOW DUE	\$10,862.20

Timekeeper Summary

Name			Hours	Rate	Amount
Partner	JMR	Jason M Rudd	1.40	560.00	\$784.00
Partner	NBN	Nick B. Nelson	8.80	495.00	\$4,356.00
Associate	SDL	Scott D. Lawrence	1.40	420.00	\$588.00
			11.60		\$5,728.00

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Federal Tax No: 45-4183914

October 7, 2020

Invoice No: 127401  
Our File No: 7066-21 JMR  
Billing through: 09/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Relief from Stay and Adequate Protection

TOTAL FEES	\$1,148.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$1,148.00
NET BALANCE FORWARD	\$67.20
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$1,215.20</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

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Federal Tax No. 45-4183914

October 7, 2020

Invoice No. 127401  
Reference No. 7066-21 JMR

Greg Milligan  
Attn: Gregory S. Milligan

Relief from Stay and Adequate Protection

### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
123568	07/06/2020	21	JMR	\$336.00	\$67.20
Total Outstanding Balance					\$67.20
Total Amount Due on this Invoice					\$1,148.00
Total Balance Now Due					\$1,215.20

### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$0.00	\$0.00	\$0.00	\$67.20	\$0.00	\$67.20

Please remit payment within 30 days. Thank you!



Wick Phillips Gould & Martin, LLP

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(214) 692-6255  
Federal Tax ID: 45-4183914

October 7, 2020

Invoice No: 127401  
Our File No: 7066-21 JMR  
Billing through: 09/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

Relief from Stay and Adequate Protection

Balance forward as of invoice dated 07/06/2020	\$336.00
Payments received since last invoice	\$268.80
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$67.20</u>
Trust balance carried forward	\$0.00

FOR PROFESSIONAL SERVICES RENDERED

09/03/2020	JMR	Correspondence with Panache regarding Schindler notice and assessment of stay issues (.2); correspondence with S.Lawrence to advance same (.2)	0.40 hrs	560 /hr	224.00
09/03/2020	SDL	Research and review potential stay violation by supplier and possible responses (1.5); memo to J. Rudd regarding same (.7).	2.20 hrs	420 /hr	924.00
Total fees for this matter			<u>2.60 hrs</u>		<u>1,148.00</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 1 Invoice No: 127401 Invoice through: 09/30/2020
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**BILLING SUMMARY**

TOTAL FEES	\$1,148.00
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$1,148.00
NET BALANCE FORWARD	\$67.20
TOTAL BALANCE NOW DUE	\$1,215.20

**Timekeeper Summary**

Name		Hours	Rate	Amount
Partner	JMR Jason M Rudd	0.40	560.00	\$224.00
Associate	SDL Scott D. Lawrence	2.20	420.00	\$924.00
		2.60		\$1,148.00

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Federal Tax No: 45-4183914

October 7, 2020

Invoice No: 127402  
Our File No: 7066-13 JMR  
Billing through: 09/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Employment and Fee Applications

TOTAL FEES	\$2,464.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$2,464.00
NET BALANCE FORWARD	\$13,550.44
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$16,014.44</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP  
Please include invoice number on payment. Thank you!

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Federal Tax No. 45-4183914

October 7, 2020

Invoice No. 127402  
Reference No. 7066-13 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Employment and Fee Applications

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122443	06/22/2020	13	JMR	\$23,797.72	\$4,759.54
123578	07/06/2020	13	JMR	\$32,256.00	\$6,451.20
124868	08/06/2020	13	JMR	\$4,137.00	\$827.40
126138	09/03/2020	13	JMR	\$7,561.50	\$1,512.30
Total Outstanding Balance					\$13,550.44
Total Amount Due on this Invoice					\$2,464.00
Total Balance Now Due					\$16,014.44

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$0.00	\$1,512.30	\$827.40	\$11,210.74	\$0.00	\$13,550.44

Please remit payment within 30 days. Thank you!

Wick Phillips Gould & Martin, LLP

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(214) 692-6255  
Federal Tax ID: 45-4183914

October 7, 2020

Invoice No: 127402  
Our File No: 7066-13 JMR  
Billing through: 09/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

Employment and Fee Applications

Balance forward as of invoice dated 09/03/2020	\$19,599.64
Payments received since last invoice	\$6,049.20
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$13,550.44</u>
Trust balance carried forward	\$0.00

FOR PROFESSIONAL SERVICES RENDERED

09/04/2020	JMR	Correspondence with Trustee professionals in preparations for Aug fee app service under financing order (.2)	0.20 hrs	560 /hr	112.00
09/06/2020	JMR	Finalize, revise and servie August Trustee professional team fee statements per procedures order (0.3)	0.30 hrs	560 /hr	168.00
09/25/2020	JMR	Telephone conferences (2) with potential counsel engagement terms and advancing applicaitons on same (.9); telephone conferences with G. Milligan on strategy regarding same (.3)	1.20 hrs	560 /hr	672.00
09/26/2020	JMR	Correspondence with potential counsel on follow up questions and next steps (.3); correspondence with Trustee on same (.1)	0.40 hrs	560 /hr	224.00
09/27/2020	JMR	Correspondence with potential counsel regarding retention terms (.4)	0.40 hrs	560 /hr	224.00
09/27/2020	JMR	Draft stipulation regarding Escrowed funds and Trustee compensation under 326 (1.0)	1.00 hrs	560 /hr	560.00
09/28/2020	JMR	Finalize Sec. 326 Stipulation with M&M Claimants, Panache and Romspen, including T. Scannell comments to same (.3); correspondence on approval and execution of same (.3); finalize same with Trustee and approve filing (.2)	0.90 hrs	560 /hr	504.00
Total fees for this matter			<u>4.40 hrs</u>		<u>2,464.00</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 1 Invoice No: 127402 Invoice through: 09/30/2020
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**BILLING SUMMARY**

TOTAL FEES	\$2,464.00
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$2,464.00
NET BALANCE FORWARD	\$13,550.44
TOTAL BALANCE NOW DUE	\$16,014.44

**Timekeeper Summary**

Name	Hours	Rate	Amount
Partner JMR Jason M Rudd	4.40	560.00	\$2,464.00
	4.40		\$2,464.00

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Federal Tax No: 45-4183914

October 7, 2020

Invoice No: 127830  
Our File No: 7066-01 JMR  
Billing through: 09/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: 3443 Zen Gardens Bankruptcy

TOTAL FEES	\$0.00
TOTAL DISBURSEMENTS	\$29.70
TOTAL CHARGES FOR THIS BILL	<hr/> \$29.70
NET BALANCE FORWARD	\$214.50
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$244.20</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

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Federal Tax No. 45-4183914

October 7, 2020

Invoice No. 127830  
Reference No. 7066-01 JMR

Greg Milligan  
Attn: Gregory S. Milligan

3443 Zen Gardens Bankruptcy

### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122435	06/22/2020	01	JMR	\$972.96	\$214.50
Total Outstanding Balance					\$214.50
Total Amount Due on this Invoice					\$29.70
Total Balance Now Due					<u>\$244.20</u>

### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$0.00	\$0.00	\$0.00	\$214.50	\$0.00	\$214.50

Please remit payment within 30 days. Thank you!



**Wick Phillips Gould & Martin, LLP**

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Federal Tax ID: 45-4183914

October 7, 2020

Invoice No: 127830  
Our File No: 7066-01 JMR  
Billing through: 09/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

**3443 Zen Gardens Bankruptcy**

Balance forward as of invoice dated 08/06/2020	\$419.70
Payments received since last invoice	\$205.20
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$214.50</u>
Trust balance carried forward	\$0.00

**DISBURSEMENTS**

09/30/2020	Online research	29.70
Total disbursements for this matter		<u>\$29.70</u>

**BILLING SUMMARY**

TOTAL FEES	\$0.00
TOTAL DISBURSEMENTS	\$29.70
TOTAL CHARGES FOR THIS BILL	\$29.70
NET BALANCE FORWARD	\$214.50
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$244.20</div>

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Federal Tax No: 45-4183914

November 6, 2020

Invoice No: 128946  
Our File No: 7066-13 JMR  
Billing through: 10/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Employment and Fee Applications

TOTAL FEES	\$7,378.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$7,378.00
NET BALANCE FORWARD	\$14,043.24
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$21,421.24</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

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Federal Tax No. 45-4183914

November 6, 2020

Invoice No. 128946  
Reference No. 7066-13 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Employment and Fee Applications

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122443	06/22/2020	13	JMR	\$23,797.72	\$4,759.54
123578	07/06/2020	13	JMR	\$32,256.00	\$6,451.20
124868	08/06/2020	13	JMR	\$4,137.00	\$827.40
126138	09/03/2020	13	JMR	\$7,561.50	\$1,512.30
127402	10/07/2020	13	JMR	\$2,464.00	\$492.80
Total Outstanding Balance					\$14,043.24
Total Amount Due on this Invoice					\$7,378.00
Total Balance Now Due					<u>\$21,421.24</u>

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$492.80	\$0.00	\$1,512.30	\$827.40	\$11,210.74	\$14,043.24

Please remit payment within 30 days. Thank you!

**Wick Phillips Gould & Martin, LLP**

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

November 6, 2020

Invoice No: 128946  
Our File No: 7066-13 JMR  
Billing through: 10/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Employment and Fee Applications**

Balance forward as of invoice dated 10/07/2020	\$16,014.44
Payments received since last invoice	\$1,971.20
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$14,043.24</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

10/07/2020	JMR	Correspondence with trustee professionals to advance Sept fee statement (.3)	0.30 hrs	560 /hr	168.00
10/14/2020	SDL	Correspondence with T. Irion regarding Sprouse fee application.	0.10 hrs	420 /hr	42.00
10/16/2020	JMR	Draft 326 stipulation regarding closing date payments to creditors (.2); correspondence on same (.1)	0.30 hrs	560 /hr	168.00
10/21/2020	JMR	Correspondence with trustee team on fee notice and application issues (.2)	0.20 hrs	560 /hr	112.00
10/21/2020	SDL	Revisions to application for fees for Sprouse.	1.40 hrs	420 /hr	588.00
10/22/2020	SDL	Additional review and revisions to Sprouse application.	0.50 hrs	420 /hr	210.00
10/26/2020	SDL	Call with Sprouse representative regarding fee application and payment (.1); work on analysis of Sprouse invoices and time entries for inclusion in fee application (1.8).	1.90 hrs	420 /hr	798.00
10/27/2020	SDL	Correspondence with E. White regarding application for compensation for Harney Partners (.1); revisions to first and final application for compensation for Sprouse (2.3).	2.40 hrs	420 /hr	1,008.00
10/28/2020	SDL	Review and revise Harney Partners fee application based on comments from E. White.	0.50 hrs	420 /hr	210.00
10/29/2020	SDL	Continue revisions to fee applications for Sprouse (.7) and Harney Partners (.9); research form of interim application for Trustee fee (.8).	2.40 hrs	420 /hr	1,008.00
10/30/2020	SDL	Finalize draft of Harney Partners fee application (1.4); analysis, organization and preparation of information for inclusion in Wick Phillips fee	5.10 hrs	420 /hr	2,142.00

Greg Milligan as proposed ch 11 trustee of  
3443 Zen Garden LP  
For Professional Services Rendered

Page 1  
Invoice No: 128946  
Invoice through: 10/31/2020

		application, including calculations of total fees billed, fees remaining unpaid under Fee Procedures Order, categorization and totals of expenses, calculation of blended rates, and associated analysis (3.2); revisions to drafts of Wick Phillips fee application (.5).			
10/30/2020	SDL		0.00 hrs	420 /hr	N/C
10/31/2020	SDL	Additional analysis and completion of remaining calculations related to Wick Phillips fee application (1.3); finalize revisions to Wick Phillips fee application (.9).	2.20 hrs	420 /hr	924.00
Total fees for this matter			17.30 hrs		7,378.00

**BILLING SUMMARY**

TOTAL FEES	\$7,378.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	\$7,378.00
NET BALANCE FORWARD	\$14,043.24
TOTAL BALANCE NOW DUE	\$21,421.24

**Timekeeper Summary**

Name			Hours	Rate	Amount
Partner	JMR	Jason M Rudd	0.80	560.00	\$448.00
Associate	SDL	Scott D. Lawrence	0.00	0.00	\$0.00
Associate	SDL	Scott D. Lawrence	16.50	420.00	\$6,930.00
			17.30		\$7,378.00

**Required Notice to Clients.**

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## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200 phone  
(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

November 6, 2020

Invoice No: 128947  
Our File No: 7066-07 JMR  
Billing through: 10/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Budgeting (Case)

TOTAL FEES	\$112.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$112.00
NET BALANCE FORWARD	\$108.40
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$220.40</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax No. 45-4183914

November 6, 2020

Invoice No. 128947  
Reference No. 7066-07 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Budgeting (Case)

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122447	06/22/2020	07	JMR	\$84.00	\$16.80
124860	08/06/2020	07	JMR	\$66.00	\$13.20
127396	10/07/2020	07	JMR	\$392.00	\$78.40
Total Outstanding Balance					\$108.40
Total Amount Due on this Invoice					\$112.00
Total Balance Now Due					<u>\$220.40</u>

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$78.40	\$0.00	\$0.00	\$13.20	\$16.80	\$108.40

Please remit payment within 30 days. Thank you!

Wick Phillips Gould & Martin, LLP

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Suite 500  
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(214) 692-6255  
Federal Tax ID: 45-4183914

November 6, 2020

Invoice No: 128947  
Our File No: 7066-07 JMR  
Billing through: 10/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

Budgeting (Case)

Balance forward as of invoice dated 10/07/2020	\$422.00
Payments received since last invoice	\$313.60
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$108.40</u>
Trust balance carried forward	\$0.00

FOR PROFESSIONAL SERVICES RENDERED

10/08/2020	JMR	Analysis of professional fee budgets verses financing order budgets on same (.2)	0.20 hrs	560 /hr	112.00
Total fees for this matter			<u>0.20 hrs</u>		<u>112.00</u>



Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 1 Invoice No: 128947 Invoice through: 10/31/2020
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BILLING SUMMARY

TOTAL FEES	\$112.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	\$112.00
NET BALANCE FORWARD	\$108.40
TOTAL BALANCE NOW DUE	\$220.40

Timekeeper Summary

Name	Hours	Rate	Amount
Partner JMR Jason M Rudd	0.20	560.00	\$112.00
	0.20		\$112.00

Required Notice to Clients.

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## Wick Phillips Gould & Martin, LLP

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Federal Tax No: 45-4183914

November 6, 2020

Invoice No: 128948  
Our File No: 7066-03 JMR  
Billing through: 10/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Asset Analysis and Recovery

TOTAL FEES	\$2,227.50
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$2,227.50
NET BALANCE FORWARD	\$6,279.80
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$8,507.30</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

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Suite 500  
Dallas, TX 75204  
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(214) 692-6255  
Federal Tax No. 45-4183914

November 6, 2020

Invoice No. 128948  
Reference No. 7066-03 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Asset Analysis and Recovery

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122449	06/22/2020	03	JMR	\$13,166.00	\$2,633.20
123572	07/06/2020	03	JMR	\$4,118.50	\$823.70
124863	08/06/2020	03	JMR	\$1,097.85	\$213.20
126132	09/03/2020	03	JMR	\$7,320.50	\$1,464.10
127399	10/07/2020	03	JMR	\$5,728.00	\$1,145.60
Total Outstanding Balance					\$6,279.80
Total Amount Due on this Invoice					\$2,227.50
Total Balance Now Due					<u>\$8,507.30</u>

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$1,145.60	\$0.00	\$1,464.10	\$213.20	\$3,456.90	\$6,279.80

Please remit payment within 30 days. Thank you!

Wick Phillips Gould & Martin, LLP

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(214) 692-6255  
Federal Tax ID: 45-4183914

November 6, 2020

Invoice No: 128948  
Our File No: 7066-03 JMR  
Billing through: 10/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

Asset Analysis and Recovery

Balance forward as of invoice dated 10/07/2020	\$10,862.20
Payments received since last invoice	\$4,582.40
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$6,279.80</u>
Trust balance carried forward	\$0.00

FOR PROFESSIONAL SERVICES RENDERED

10/12/2020	NBN	Attend call with A. Zarafshani regarding A-1 and American; review documents produced by A. Zarafshani.	4.50 hrs	495 /hr	2,227.50
Total fees for this matter			<u>4.50 hrs</u>		<u>2,227.50</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 1 Invoice No: 128948 Invoice through: 10/31/2020
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**BILLING SUMMARY**

TOTAL FEES	\$2,227.50
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$2,227.50
NET BALANCE FORWARD	\$6,279.80
TOTAL BALANCE NOW DUE	\$8,507.30

**Timekeeper Summary**

Name		Hours	Rate	Amount
Partner	NBN Nick B. Nelson	4.50	495.00	\$2,227.50
		4.50		\$2,227.50

**Required Notice to Clients.**

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Federal Tax No: 45-4183914

November 6, 2020

Invoice No: 128949  
Our File No: 7066-04 JMR  
Billing through: 10/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Asset Disposition

TOTAL FEES	\$22,521.50
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$22,521.50
NET BALANCE FORWARD	\$17,226.70
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$39,748.20</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

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Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax No. 45-4183914

November 6, 2020

Invoice No. 128949  
Reference No. 7066-04 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Asset Disposition

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122448	06/22/2020	04	JMR	\$3,370.00	\$674.00
123574	07/06/2020	04	JMR	\$7,966.00	\$1,593.20
124866	08/06/2020	04	JMR	\$7,938.00	\$1,587.60
126133	09/03/2020	04	JMR	\$22,578.17	\$4,470.40
127398	10/07/2020	04	JMR	\$44,507.50	\$8,901.50
Total Outstanding Balance					\$17,226.70
Total Amount Due on this Invoice					\$22,521.50
Total Balance Now Due					<u>\$39,748.20</u>

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$8,901.50	\$0.00	\$4,470.40	\$1,587.60	\$2,267.20	\$17,226.70

Please remit payment within 30 days. Thank you!

**Wick Phillips Gould & Martin, LLP**

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

November 6, 2020

Invoice No: 128949  
Our File No: 7066-04 JMR  
Billing through: 10/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Asset Disposition**

Balance forward as of invoice dated 10/07/2020	\$52,832.70
Payments received since last invoice	\$35,606.00
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$17,226.70</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

10/01/2020	JMR	Final analysis and preparations for exhibits for sale hearing (1.2); correspondence with G. Milligan on marketing and sale process exhibits (0.3); correspondence with T. Scannell on same (.1); correspondence with D. Rushing on same (.2); analysis of Romspen exhibits (.5); strategy conference with S. Lawrence to prepare declarations regarding sale hearing (.3)	2.50 hrs	560 /hr	1,400.00
10/01/2020	SDL	Continue revisions to sale order (1.7); review Bid Procedures order and draft notice of sale order (.7); call with Trustee and team regarding same (.5); finalize and correspondence with B. Ramirez regarding same (.3); correspondence with Lender's counsel and J. Rudd regarding redline of sale order (.5).	3.70 hrs	420 /hr	1,554.00
10/02/2020	JMR	Analysis and preparations of exhibits for sale hearing, including marketing process prove up (.8); coordinate submission and service of same (.3); correspondence with Trustee on same (0.3); coordinate preparation of proffer for trustee's direct (.2)	1.60 hrs	560 /hr	896.00
10/02/2020	SDL	Begin draft of proffer for G. Milligan regarding sale hearing.	1.80 hrs	420 /hr	756.00
10/03/2020	JMR	Revise and comment on draft Milligan declaration in support of sale motion (.5); analysis of D. White exhibit list (.2); correspondence with G. Milligan on same (.1); analysis of K. Mercer comments to Sale Order and approve same (.3); correspondence and research on D. White witnesses (.4);	1.60 hrs	560 /hr	896.00



		Page		1	
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP		Invoice No:		128949	
For Professional Services Rendered		Invoice through:		10/31/2020	
	correspondence with T. Scannell on same and exhibits (.1)				
10/03/2020	SDL	Review and revise G. Milligan proffer for sale hearing.	1.70 hrs	420 /hr	714.00
10/05/2020	JMR	Telephone conferences (2) with T. Scannell on sale hearing preparations and related issues (.5); correspondence with R. Horton (.1); revise G. Milligan declaration in support of same (3.2); analysis of new objection filed by D. White (.7); correspondence with Trustee and Cushman team on same (.4); hearing preparation call with G. Milligan and Trustee legal team (.6)	5.50 hrs	560 /hr	3,080.00
10/06/2020	JMR	Analysis of G. Milligan comments to draft declaration in support of sale motion (0.2); portion of trustee team preparation call to finalize declaration and preparations for sale hearing (.3); revise declaration based on G. Milligan comments (.3); telephone conference with T. Mills (CW) and G. Milligan to finalize declaration (.4); final comments and file G. Milligan declaration (.3)	1.50 hrs	560 /hr	840.00
10/06/2020	JMR	Analysis of declarations filed by White Parties and Romspen (.8); telephone conferences (2) with T. Scannell on hearing preparations (.6); conference to prepare G. Milligan for cross examination during sale hearing (.5); pretrial conference with D. Williamson, T. Scannell and B. Duke (1.1); revisions to sale order (.4); revisions to claim estimation order (.4); revisions to draft deed from T. Scannell (.4); correspondence with G. Milligan on same (.3); correspondence with T. Scannell on same (.3); prepare for hearing on sale motion and claim estimation motions and related White objections (1.2)	6.00 hrs	560 /hr	3,360.00
10/06/2020	RAG	Review draft Trustee's Deed, draft Sale Order, and vesting deed (0.6); draft comments to Trustee's Deed (0.4); attention to correspondence regarding Trustee's Deed (0.4); revise and update Trustee's Deed warranties and disclaimers in response to J. Rudd comments (0.4).	1.80 hrs	475 /hr	855.00
10/06/2020	SDL	Support preparation for sale hearing, including review and memo regarding prepetition payments and exhibit handling.	0.80 hrs	420 /hr	336.00
10/07/2020	JMR	Correspondence on final language to resolve sale order objection with D. Williamson and T. Scannell (.4); analysis of revised form of order from T. Scannell on same (.3); correspondence with G. Milligan on same (.1); correspondence with Court chambers regarding agreement on form of order (.2); draft and file notice of redlined comments to form sale order (.3); prehearing conference call with G. Milligan on final hearing preparations (.3); prehearing conference call with T. Scannell (.2); final preparation for hearing (.5); appear for and present case at sale hearing (.7); post hearing conference with G. Milligan and trustee team on sale closing and transition (.3); finalize order for upload (.2); correspondence with T. Scannell on same (.2);	4.10 hrs	560 /hr	2,296.00

		Page		2	
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP		Invoice No:		128949	
For Professional Services Rendered		Invoice through:		10/31/2020	
	correspondence and call with G. Milligan on same (.2)				
10/07/2020	SDL	Calls with J. Rudd, Trustee and E. White to prepare for sale hearing (.3); post-hearing call to discuss next steps regarding sale (.2); draft notice of closing of sale (.3).	0.80 hrs	420 /hr	336.00
10/08/2020	JMR	Strategy conference with T. Scannell regarding closing and transition of property (.3); update call with G. Milligan on same (.3); correspondence on closing preparations (.4); analysis of sale order on same (.2)	1.20 hrs	560 /hr	672.00
10/09/2020	JMR	Analysis of revised deed from T. Scannell (.3); correspondence with G. Milligan on same (.2); correspondence with T. Mills at Cushman regarding sale closing schedule and related updates and issue (.3)	0.80 hrs	560 /hr	448.00
10/12/2020	JMD	Review and revise drafts of the Chapter 11 Trustee's Liquidating Plan and the Disclosure Statement for such plan and provide comments to Jason Rudd	5.10 hrs	515 /hr	2,626.50
10/13/2020	JMR	Analysis of T. Scannell closing check list and revise same (.3); correspondence on approval of revised deed with G. Milligan and T. Scannell (.3); strategy conference with T. Scannell on same and closing preparations (.3); revise notice of same closing (.2); correspondence with T. Scannell on same (.1); correspondence with G. Milligan regarding Sale Order and closing issues (.3); correspondence with A. Zarafshani on same (.1)	1.60 hrs	560 /hr	896.00
10/15/2020	JMR	Correspondence on sale closing with G. Milligan and T. Scannell (.4); review final deed form for same (.2)	0.60 hrs	560 /hr	336.00
10/16/2020	JMR	Finalize notice of closing of sale per sale order (.1); correspondence with G. Milligan regarding same (.1); review recorded sale documents and file notice of closing (.2)	0.40 hrs	560 /hr	224.00
Total fees for this matter			43.10 hrs		22,521.50

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 3 Invoice No: 128949 Invoice through: 10/31/2020
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**BILLING SUMMARY**

TOTAL FEES	\$22,521.50
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$22,521.50
NET BALANCE FORWARD	\$17,226.70
TOTAL BALANCE NOW DUE	\$39,748.20

**Timekeeper Summary**

Name			Hours	Rate	Amount
Partner	JMD	Jeffrey M. Dalton	5.10	515.00	\$2,626.50
Partner	JMR	Jason M Rudd	27.40	560.00	\$15,344.00
Associate	RAG	Ryan A. Goins	1.80	475.00	\$855.00
Associate	SDL	Scott D. Lawrence	8.80	420.00	\$3,696.00
			43.10		\$22,521.50

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## Wick Phillips Gould & Martin, LLP

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(214) 692-6200 phone  
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Federal Tax No: 45-4183914

November 6, 2020

Invoice No: 128950  
Our File No: 7066-22 JMR  
Billing through: 10/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Reporting

TOTAL FEES	\$336.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$336.00
NET BALANCE FORWARD	\$1,830.70
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$2,166.70</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax No. 45-4183914

November 6, 2020

Invoice No. 128950  
Reference No. 7066-22 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Reporting

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122442	06/22/2020	22	JMR	\$6,659.50	\$1,331.90
123570	07/06/2020	22	JMR	\$168.00	\$33.60
124856	08/06/2020	22	JMR	\$224.00	\$44.80
126127	09/03/2020	22	JMR	\$168.00	\$33.60
127395	10/07/2020	22	JMR	\$1,934.00	\$386.80
Total Outstanding Balance					\$1,830.70
Total Amount Due on this Invoice					\$336.00
Total Balance Now Due					<u>\$2,166.70</u>

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$386.80	\$0.00	\$33.60	\$44.80	\$1,365.50	\$1,830.70

Please remit payment within 30 days. Thank you!

**Wick Phillips Gould & Martin, LLP**

3131 McKinney Avenue  
Suite 500  
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(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

November 6, 2020

Invoice No: 128950  
Our File No: 7066-22 JMR  
Billing through: 10/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Reporting**

Balance forward as of invoice dated 10/07/2020	\$3,377.90
Payments received since last invoice	\$1,547.20
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$1,830.70</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

10/18/2020	JMR	Review and approve MOR and coordinate filing (.2)	0.20 hrs	560 /hr	112.00
10/19/2020	JMR	Review and analysis of budget variance reporting (.3); correspondence with E. White on same (.1)	0.40 hrs	560 /hr	224.00
Total fees for this matter			0.60 hrs		<u>336.00</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 1 Invoice No: 128950 Invoice through: 10/31/2020
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BILLING SUMMARY

TOTAL FEES	\$336.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	\$336.00
NET BALANCE FORWARD	\$1,830.70
TOTAL BALANCE NOW DUE	\$2,166.70

Timekeeper Summary

Name	Hours	Rate	Amount
Partner JMR Jason M Rudd	0.60	560.00	\$336.00
	0.60		\$336.00

Required Notice to Clients.

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## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200 phone  
(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

November 6, 2020

Invoice No: 128951  
Our File No: 7066-17 JMR  
Billing through: 10/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Meetings and Communications with Creditors

TOTAL FEES	\$686.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$686.00
NET BALANCE FORWARD	\$845.60
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$1,531.60</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!



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(214) 692-6255  
Federal Tax No. 45-4183914

November 6, 2020

Invoice No. 128951  
Reference No. 7066-17 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Meetings and Communications with Creditors

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122439	06/22/2020	17	JMR	\$2,072.00	\$414.40
123573	07/06/2020	17	JMR	\$1,218.00	\$243.60
124871	08/06/2020	17	JMR	\$770.00	\$154.00
126139	09/03/2020	17	JMR	\$168.00	\$33.60
Total Outstanding Balance					\$845.60
Total Amount Due on this Invoice					\$686.00
Total Balance Now Due					\$1,531.60

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$0.00	\$0.00	\$33.60	\$154.00	\$658.00	\$845.60

Please remit payment within 30 days. Thank you!

**Wick Phillips Gould & Martin, LLP**

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(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

November 6, 2020

Invoice No: 128951  
Our File No: 7066-17 JMR  
Billing through: 10/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Meetings and Communications with Creditors**

Balance forward as of invoice dated 09/03/2020	\$980.00
Payments received since last invoice	\$134.40
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$845.60</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

10/15/2020	JMR	Conference call with White Parties' counsel and potential late filed Sentry claim and related case update questions (.6)	0.60 hrs	560 /hr	336.00
10/19/2020	JMR	Conference with White Parties regarding potential claims (.4)	0.40 hrs	560 /hr	224.00
10/28/2020	SDL	Correspondence to representative of Ruiz Testing Services regarding status of bankruptcy case and next steps.	0.30 hrs	420 /hr	126.00
Total fees for this matter			<u>1.30 hrs</u>		<u>686.00</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 1 Invoice No: 128951 Invoice through: 10/31/2020
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**BILLING SUMMARY**

TOTAL FEES	\$686.00
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$686.00
NET BALANCE FORWARD	\$845.60
TOTAL BALANCE NOW DUE	\$1,531.60

Timekeeper Summary

Name			Hours	Rate	Amount
Partner	JMR	Jason M Rudd	1.00	560.00	\$560.00
Associate	SDL	Scott D. Lawrence	0.30	420.00	\$126.00
			1.30		\$686.00

Required Notice to Clients.

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Federal Tax No: 45-4183914

November 6, 2020

Invoice No: 128952  
Our File No: 7066-08 JMR  
Billing through: 10/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Business Operations

TOTAL FEES	\$1,848.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$1,848.00
NET BALANCE FORWARD	\$3,844.80
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$5,692.80</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

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Suite 500  
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(214) 692-6200  
(214) 692-6255  
Federal Tax No. 45-4183914

November 6, 2020

Invoice No. 128952  
Reference No. 7066-08 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Business Operations

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122446	06/22/2020	08	JMR	\$5,026.00	\$1,005.20
123575	07/06/2020	08	JMR	\$6,286.00	\$1,257.20
124861	08/06/2020	08	JMR	\$5,152.00	\$1,030.40
126136	09/03/2020	08	JMR	\$2,760.00	\$552.00
Total Outstanding Balance					\$3,844.80
Total Amount Due on this Invoice					\$1,848.00
Total Balance Now Due					\$5,692.80

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$0.00	\$0.00	\$552.00	\$1,030.40	\$2,262.40	\$3,844.80

Please remit payment within 30 days. Thank you!

Wick Phillips Gould & Martin, LLP

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(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

November 6, 2020

Invoice No: 128952  
Our File No: 7066-08 JMR  
Billing through: 10/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

Business Operations

Balance forward as of invoice dated 09/03/2020	\$6,052.80
Payments received since last invoice	\$2,208.00
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$3,844.80</u>
Trust balance carried forward	\$0.00

FOR PROFESSIONAL SERVICES RENDERED

10/08/2020	JMR	Strategy and operations transitions conference with A. Zarafshani and Panache team, G. Milligan and E. White (.8); coordinate same with T. Scannel(.2); follow up call with G. Milligan on same (.2)	1.20 hrs	560 /hr	672.00
10/09/2020	JMR	Correspondence with T. Scannell regarding transition of Property and Project operations and planning for same (.2); strategy and transition call with Romspen and Trustee team to advance same (.8); follow up call with G. Milligan on same (.3)	1.30 hrs	560 /hr	728.00
10/13/2020	JMR	Correspondence with G. Milligan and A. Zarafshani regarding insurance and related management issues (.2); analysis of issues on same (.2)	0.40 hrs	560 /hr	224.00
10/15/2020	JMR	Correspondence on Schindler contract (.2); correspondence with A. Zarafshani and Trustee on utilities transfer (.2)	0.40 hrs	560 /hr	224.00
Total fees for this matter			<u>3.30 hrs</u>		<u>1,848.00</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 1 Invoice No: 128952 Invoice through: 10/31/2020
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**BILLING SUMMARY**

TOTAL FEES	\$1,848.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	\$1,848.00
NET BALANCE FORWARD	\$3,844.80
TOTAL BALANCE NOW DUE	\$5,692.80

**Timekeeper Summary**

Name	Hours	Rate	Amount
Partner JMR Jason M Rudd	3.30	560.00	\$1,848.00
	3.30		\$1,848.00

**Required Notice to Clients.**

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Federal Tax No: 45-4183914

November 6, 2020

Invoice No: 128953  
Our File No: 7066-10 JMR  
Billing through: 10/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Claims Administration and Objections

TOTAL FEES	\$168.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$168.00
NET BALANCE FORWARD	\$1,248.10
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$1,416.10</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP  
Please include invoice number on payment. Thank you!



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Federal Tax No. 45-4183914

November 6, 2020

Invoice No. 128953  
Reference No. 7066-10 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Claims Administration and Objections

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122444	06/22/2020	10	JMR	\$630.00	\$126.00
123581	07/06/2020	10	JMR	\$1,713.00	\$342.60
124867	08/06/2020	10	JMR	\$280.00	\$56.00
126140	09/03/2020	10	JMR	\$1,064.00	\$212.80
127392	10/07/2020	10	JMR	\$2,735.53	\$510.70
Total Outstanding Balance					\$1,248.10
Total Amount Due on this Invoice					\$168.00
Total Balance Now Due					<u>\$1,416.10</u>

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$510.70	\$0.00	\$212.80	\$56.00	\$468.60	\$1,248.10

Please remit payment within 30 days. Thank you!

**Wick Phillips Gould & Martin, LLP**

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Federal Tax ID: 45-4183914

November 6, 2020

Invoice No: 128953  
Our File No: 7066-10 JMR  
Billing through: 10/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Claims Administration and Objections**

Balance forward as of invoice dated 10/07/2020	\$3,472.93
Payments received since last invoice	\$2,224.83
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$1,248.10</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

10/15/2020	SDL	Correspondence to representative of creditor regarding case status.	0.20 hrs	420 /hr	84.00
10/21/2020	SDL	Call with counsel for the Receiver regarding administrative claim.	0.20 hrs	420 /hr	84.00
Total fees for this matter			<u>0.40 hrs</u>		<u>168.00</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP For Professional Services Rendered	Page 1 Invoice No: 128953 Invoice through: 10/31/2020
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BILLING SUMMARY

TOTAL FEES	\$168.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	\$168.00
NET BALANCE FORWARD	\$1,248.10
TOTAL BALANCE NOW DUE	\$1,416.10

Timekeeper Summary

Name	Hours	Rate	Amount
Associate     SDL     Scott D. Lawrence	0.40	420.00	\$168.00
	0.40		\$168.00

Required Notice to Clients.

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November 6, 2020

Invoice No: 128954  
Our File No: 7066-19 JMR  
Billing through: 10/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Plan and Disclosure Statement

TOTAL FEES	\$59,864.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$59,864.00
NET BALANCE FORWARD	\$15,939.06
TOTAL BALANCE NOW DUE	<div>\$75,803.06</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

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Federal Tax No. 45-4183914

November 6, 2020

Invoice No. 128954  
Reference No. 7066-19 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Plan and Disclosure Statement

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122437	06/22/2020	19	JMR	\$7,586.50	\$1,517.06
123571	07/06/2020	19	JMR	\$9,871.00	\$1,974.20
124859	08/06/2020	19	JMR	\$18,111.00	\$3,622.20
126129	09/03/2020	19	JMR	\$10,318.00	\$2,063.60
127390	10/07/2020	19	JMR	\$33,810.00	\$6,762.00
Total Outstanding Balance					\$15,939.06
Total Amount Due on this Invoice					\$59,864.00
Total Balance Now Due					\$75,803.06

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$6,762.00	\$0.00	\$2,063.60	\$3,622.20	\$3,491.26	\$15,939.06

Please remit payment within 30 days. Thank you!

**Wick Phillips Gould & Martin, LLP**

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Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

November 6, 2020

Invoice No: 128954  
Our File No: 7066-19 JMR  
Billing through: 10/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Plan and Disclosure Statement**

Balance forward as of invoice dated 10/07/2020	\$42,987.06
Payments received since last invoice	\$27,048.00
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$15,939.06</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

10/03/2020	JMR	Revisions and comments to draft plan (2.3)	2.30 hrs	560 /hr	1,288.00
10/05/2020	JMR	Extensive revisions and comments on updated Trustee liquidating plan draft from S. Lawrence (2.3); correspondence with G. Milligan on same (.1)	2.40 hrs	560 /hr	1,344.00
10/05/2020	SDL	Additional revisions to plan to incorporate Lender settlement details including releases, and to incorporate classification and distribution mechanics.	5.80 hrs	420 /hr	2,436.00
10/06/2020	JMR	Analysis of G. Milligan comments to draft plan (0.4); portion of Trustee team call to address plan concepts and comment (.3); further revisions and comments to draft plan (1.3); strategy conference with R. Horton on same (.3); circulate draft plan to T. Scannell (.3)	2.60 hrs	560 /hr	1,456.00
10/06/2020	SDL	Continue revisions to plan (3.5); revisions to disclosure statement (2.1).	5.60 hrs	420 /hr	2,352.00
10/07/2020	JMR	Telephone conference with D. Williamson regarding proposed plan terms and related issues (.5); conference with G. Milligan on same (.3); telephone conference with R. Horton on same (.1); strategy discussion with S. Lawrence on plan and disclosure statement (.3)	1.20 hrs	560 /hr	672.00
10/07/2020	SDL	Continue work on revisions to disclosure statement.	3.60 hrs	420 /hr	1,512.00
10/08/2020	JMR	Strategy call with S. Lawrence to advance plan and disclosure statement revisions and drafts (.3); correspondence on same (.2)	0.50 hrs	560 /hr	280.00
10/08/2020	SDL	Revisions to disclosure statement.	8.20 hrs	420 /hr	3,444.00
10/09/2020	JMR	Correspondence with T. Scannell regarding status of	2.90 hrs	560 /hr	1,624.00

		Page		1	
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP		Invoice No:		128954	
For Professional Services Rendered		Invoice through:		10/31/2020	
	plan comments (.3); analysis of Romspen comments to draft plan (1.1); revisions and draft inserts to disclosure statement (2.5)				
10/09/2020	SDL	Finalize draft of disclosure statement (2.5); revisions to solicitation procedures motion, ballots, and related documents (5.7).	8.20 hrs	420 /hr	3,444.00
10/10/2020	JMR	Draft extensive revisions to disclosure statement and plan to incorporate settlement with Rompsen, related claim treatments and issues and refinements and insertions (3.4); correspondence with S. Lawrence on same (.3)	3.70 hrs	560 /hr	2,072.00
10/10/2020	SDL	Additional revisions to disclosure statement.	5.30 hrs	420 /hr	2,226.00
10/11/2020	JMR	Analysis and revisions to draft disclosure statement and plan (2.2); drafting conference with G. Milligan, E. White and S. Lawrence regarding revisions and comments to plan and disclosure statement and related concepts and strategies (.8); analysis of claims summary and liquidation assessment to inform plan and DS revisions (.4); extensive revisions to plan and disclosure statement to address Trustee and related comments and add concepts and inserts (3.3)	6.70 hrs	560 /hr	3,752.00
10/11/2020	SDL	Additional revisions to disclosure statement (1.9); all with Trustee, J. Rudd and E. White regarding plan, disclosure statement, and solicitation procedures motion (1.0); draft motion to expedite hearing on solicitation procedures motion (.5); additional review and revisions to plan (.9).	4.30 hrs	420 /hr	1,806.00
10/12/2020	JMR	Analysis and revisions to draft motion for consolidation disclosure statement and plan hearing and provisional DS approval and related solicitation approvals (.8); analysis of revised claims summary and liquidation analysis (.4); strategy, approval and drafting conference with G. Milligan, E. White and S. Lawrence regarding final claims assessment and related revisions and comments to plan and disclosure statement (1.0); update call with T. Scannell on plan and Panache negotiations (.2); final revisions to plan and disclosure statement (1.5); correspondence with G. Milligan on status of Panache and Rompsen negotiations and next steps (.3)	4.20 hrs	560 /hr	2,352.00
10/12/2020	SDL	Continue revisions to plan (2.1); call with Trustee, J. Rudd and E. White regarding plan, disclosure statement, claims analysis, and solicitation procedures (1.0); revisions to disclosure statement to conform to plan and make additional changes (3.4); revisions to solicitation procedures motion and ballots (1.8); review revisions from J. Dalton to plan and disclosure statement and incorporate to final drafts (1.2).	9.50 hrs	420 /hr	3,990.00
10/13/2020	JMR	Strategy conference with S. Lawrence on final preparation of plan, disclosure statement and supporting motions (.3); settlement conference with R. Horton on same (.2); assessment of negotiation options with G. Milligan (.3); settlement conference with T. Scannell on same (.3); follow up settlement	1.70 hrs	560 /hr	952.00

			Page	2	
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP			Invoice No:	128954	
For Professional Services Rendered			Invoice through:	10/31/2020	
		conference with R. Horton on plan settlement (.2); follow up call with T. Scannell on plan settlement (.2); draft email to G. Milligan with updates on same (.2)			
10/13/2020	SDL	Finalize drafts of: solicitation procedures motion (.7); plan (1.3); and disclosure statement (1.7); call with J. Rudd regarding same (.2).	3.90 hrs	420 /hr	1,638.00
10/14/2020	JMR	Plan negotiation correspondence from A. Zarafshani, R. Horton, T. Scannell and G. Milligan with updates on same (.5); correspondence with G. Milligna to advance strategy (.2)	0.70 hrs	560 /hr	392.00
10/14/2020	SDL	Multiple correspondences with counsel for Lender, counsel for Panache, Trustee and J. Rudd regarding progress toward confirmable plan.	0.80 hrs	420 /hr	336.00
10/15/2020	JMR	Preparation call with G. Milligan on messaging to Panache and Romspen on plan settlement talks (.3); plan settlement conference with T. Scannell, R. Horton and G. Milligan on breakdown in Panache subordination terms (.5); follow up call with R. Horton (.3); follow up call with T. Scannell (.2); correspondence with R. Horton and T. Scannell on follow up negotiations (.2); correspondence with G. Milligan on same (.1)	1.60 hrs	560 /hr	896.00
10/16/2020	JMR	Correspondence with T. Scannell and R. Horton regarding Panache plan treatment negotiations and related updates (.3); correspondence with G. Milligan on same and outline of next steps to file plan and hearing request (.3); follow up call with R. Horton on plan treatment for Panache (.2); correspondence with T. Scannell on same (.1); correspondence with G. Milligan on same (.2); correspondence with T. Scannell and R. Horton on timing and status of Panache/Romspen closing (.4)	1.50 hrs	560 /hr	840.00
10/17/2020	JMR	Correspondence with T. Scannell and R. Horton on status of closing on Panache/Romspen plan treatment agreements (.3); correspondence with G. Milligan on same (.3)	0.60 hrs	560 /hr	336.00
10/18/2020	JMR	Follow up correspondence with T. Scannell and R. Horton on status of closing on Panache/Romspen plan treatment agreements (.2); analysis of options to advance same (.2); correspondence with G. Milligan on same (.2); final review, updates and revisions to disclosure statement and plan in anticipation of 10/19 filing (2.4)	3.00 hrs	560 /hr	1,680.00
10/19/2020	JMR	Correspondence with T. Scannell on Romspen/Panache settlement closing status (.3); lead conference call with T. Scannell, R. Horton and G. Milligan (.3); correspondence with G. Milligan and Trustee team on proposed confirmation timeline (.3); correspondence with R. Horton to confirm Panache treatment (.2); follow up correspondence with T. Scannell and R. Horton on executed deal terms (.3); telephone conference with T. Scannell on same (.1); correspondence with UST regarding expedited consideration (.2); correspondence with D. Williamson on same (.2); finalize plan, DS, motion for conditional approval and related filings	4.10 hrs	560 /hr	2,296.00



			Page		3
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP			Invoice No:		128954
For Professional Services Rendered			Invoice through:		10/31/2020
10/19/2020	SDL	(2.2) Call with J. Rudd and B. Ramirez regarding finalizing plan, disclosure statement, motion for approval of solicitation procedures, and motion to expedite (.2); review, revise and finalize plan (1.5); correspondence with Trustee regarding same (.1); review, revise and finalize disclosure statement (1.9); review revise and finalize solicitation procedures motion (1.2); review and revise motion to expedite (.3); correspondence with B. Ramirez regarding same and revisions to service lists (.5); review Panache and Romspen term sheet regarding plan treatment (.3); correspondence with Court regarding expedited setting request (.1).	6.10 hrs	420 /hr	2,562.00
10/20/2020	JMR	Correspondence with principal creditor groups regarding comments to disclosure statement and plan (.6); correspondence on expedited hearing on same (.3); prepare strategy and outline for hearing (.7); strategy call with S. Lawrence on same (.4); correspondence with trustee team on same (.3)	2.30 hrs	560 /hr	1,288.00
10/20/2020	SDL	Additional correspondence regarding expedited hearing on solicitation procedures (.1); correspondence regarding drafts of disclosure statement and plan (.1); review and revise supplemental certificates of service (.2); review and revise notice of hearing regarding solicitation procedures motion (.1); correspondences with J. Rudd and B. Ramirez regarding witness and exhibit list for same (.5); review service lists for ballots and correspondence with B. Ramirez regarding same (.1).	1.10 hrs	420 /hr	462.00
10/21/2020	JMR	Strategy conference with Trustee team to prepare for hearing on disclosure statement and plan (.6); strategy conference with T. Scannell on same (.3); correspondence with trustee team on exhibits and demonstratives for hearing (.5)	1.40 hrs	560 /hr	784.00
10/21/2020	SDL	Correspondence with S. Tobin regarding objection to solicitation procedures motion (.1); call with J. Rudd and E. White to prepare for hearing (.4); correspondence regarding exhibits for same (.1); call with counsel for Schindler Elevator regarding solicitation procedures and hearing on same (.4); follow up correspondence to counsel for Schindler (.1); follow up correspondence to J. Rudd regarding same (.2); outline direct examination of Trustee for solicitation procedures hearing (.9);	2.20 hrs	420 /hr	924.00
10/22/2020	JMR	Correspondence with G. Milligan regarding Panache/Romspen plan settlements and documentation on same (.3); strategy call with S. Lawrence regarding hearing strategy and planning (.4); correspondence on same (.2)	0.90 hrs	560 /hr	504.00
10/22/2020	SDL	Correspondence with J. Rudd and E. White regarding claims exhibits for solicitation procedures hearing (.2); correspondence with B. Ramirez regarding exhibits for hearing (.1); revisions to witness and exhibit list for hearing (.1); correspondence with Trustee regarding exhibits for	4.40 hrs	420 /hr	1,848.00

			Page		4
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP			Invoice No:		128954
For Professional Services Rendered			Invoice through:		10/31/2020
		hearing (.1); correspondence, preparation for, and call with S. Tobin to confer on motion for conditional approval of disclosure statement (.5); revisions to plan, disclosure statement, and solicitation procedures order for post-hearing purposes (1.2); review objection to solicitation procedures motion filed by White parties (.4); correspondence to Trustee regarding same (.4); additional preparation for solicitation procedures motion (1.4).			
10/23/2020	JMR	Correspondence with White Parties on comments to DS (.3); analysis of same (.2); analysis of arguments, updates and pleadings in advance of hearing (.8); Prehearing preparation call with G. Milligan, S. Lawrence and trustee team (.7); follow up call with G. Milligan on same (.2); preparation call with S. Lawrence (.3); prehearing coordination call with T. Scannell (.3); appear for hearing on DS provisional approval motion (1.3); post-hearing call with T. Scannell (.2); follow up call with S. Lawrence to advance compliance with court ruling and next steps (.3)	4.60 hrs	560 /hr	2,576.00
10/23/2020	SDL	Continue preparation for hearing on solicitation procedures motion (1.1); call with Trustee, J. Rudd and E. White regarding solicitation procedures hearing (.5); attend hearing on solicitation procedures (1.2); follow up calls with J. Rudd and counsel for lender (.3); correspondence with B. Ramirez regarding Court's service instructions for order setting disclosure statement approval hearing (.3).	3.40 hrs	420 /hr	1,428.00
10/26/2020	SDL	Review and revise certificate of service regarding order setting hearing on approval of disclosure statement.	0.10 hrs	420 /hr	42.00
10/27/2020	JMR	Strategy and update conference with G. Milligan on compliance with court orders on DS and next steps to advance plan confirmation (.4); correspondence with trustee team on same (.3)	0.70 hrs	560 /hr	392.00
10/28/2020	SDL	Revisions to plan and disclosure statement to incorporate comments from Judge at hearing on solicitation procedures motion.	1.50 hrs	420 /hr	630.00
10/29/2020	SDL	Continue revisions to disclosure statement and plan related to Court's comments on same at hearing on solicitation procedures motion.	1.20 hrs	420 /hr	504.00
10/30/2020	JMR	Conference with K. Mercer regarding status of plan treatment for M&M claimants and related plan issues and settlement (.3); correspondence with G. Milligan on same (.4); correspondence with T. Scannell (.2)	0.90 hrs	560 /hr	504.00
Total fees for this matter			125.70 hrs		59,864.00

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP For Professional Services Rendered	Page 5 Invoice No: 128954 Invoice through: 10/31/2020
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**BILLING SUMMARY**

TOTAL FEES	\$59,864.00
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$59,864.00
NET BALANCE FORWARD	\$15,939.06
TOTAL BALANCE NOW DUE	\$75,803.06

Timekeeper Summary

Name			Hours	Rate	Amount
Partner	JMR	Jason M Rudd	50.50	560.00	\$28,280.00
Associate	SDL	Scott D. Lawrence	75.20	420.00	\$31,584.00
			125.70		\$59,864.00

Required Notice to Clients.

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## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200 phone  
(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

November 6, 2020

Invoice No: 128955  
Our File No: 7066-01 JMR  
Billing through: 10/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: 3443 Zen Gardens Bankruptcy

TOTAL FEES	\$0.00
TOTAL DISBURSEMENTS	\$1,123.44
TOTAL CHARGES FOR THIS BILL	<hr/> \$1,123.44
NET BALANCE FORWARD	\$214.50
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$1,337.94</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

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(214) 692-6200  
(214) 692-6255  
Federal Tax No. 45-4183914

November 6, 2020

Invoice No. 128955  
Reference No. 7066-01 JMR

Greg Milligan  
Attn: Gregory S. Milligan

3443 Zen Gardens Bankruptcy

### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122435	06/22/2020	01	JMR	\$972.96	\$214.50
Total Outstanding Balance					\$214.50
Total Amount Due on this Invoice					\$1,123.44
Total Balance Now Due					<u>\$1,337.94</u>

### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$0.00	\$0.00	\$0.00	\$0.00	\$214.50	\$214.50

Please remit payment within 30 days. Thank you!

**Wick Phillips Gould & Martin, LLP**

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

November 6, 2020

Invoice No: 128955  
Our File No: 7066-01 JMR  
Billing through: 10/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

**3443 Zen Gardens Bankruptcy**

Balance forward as of invoice dated 10/07/2020	\$244.20
Payments received since last invoice	\$29.70
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$214.50</u>
Trust balance carried forward	\$0.00

**DISBURSEMENTS**

10/20/2020	Inventus - September Hosting	1,111.04
10/31/2020	Online research	12.40
	Total disbursements for this matter	<u>\$1,123.44</u>

**BILLING SUMMARY**

TOTAL FEES	\$0.00
TOTAL DISBURSEMENTS	\$1,123.44
TOTAL CHARGES FOR THIS BILL	\$1,123.44
NET BALANCE FORWARD	\$214.50
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$1,337.94</div>

Required Notice to Clients.

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## Wick Phillips Gould & Martin, LLP

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Suite 500  
Dallas, TX 75204  
(214) 692-6200 phone  
(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

November 6, 2020

Invoice No: 128956  
Our File No: 7066-15 JMR  
Billing through: 10/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Financing and Cash Collateral

TOTAL FEES	\$1,106.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$1,106.00
NET BALANCE FORWARD	\$21,391.40
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$22,497.40</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax No. 45-4183914

November 6, 2020

Invoice No. 128956  
Reference No. 7066-15 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Financing and Cash Collateral

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122441	06/22/2020	15	JMR	\$52,173.50	\$10,434.70
123580	07/06/2020	15	JMR	\$34,250.50	\$6,850.10
124870	08/06/2020	15	JMR	\$7,387.50	\$1,477.50
126125	09/03/2020	15	JMR	\$9,171.00	\$1,834.20
127387	10/07/2020	15	JMR	\$4,843.05	\$794.90
Total Outstanding Balance					\$21,391.40
Total Amount Due on this Invoice					\$1,106.00
Total Balance Now Due					<u>\$22,497.40</u>

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$794.90	\$0.00	\$1,834.20	\$1,477.50	\$17,284.80	\$21,391.40

Please remit payment within 30 days. Thank you!



**Wick Phillips Gould & Martin, LLP**

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Dallas, TX 75204  
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(214) 692-6255  
Federal Tax ID: 45-4183914

November 6, 2020

Invoice No: 128956  
Our File No: 7066-15 JMR  
Billing through: 10/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Financing and Cash Collateral**

Balance forward as of invoice dated 10/07/2020	\$25,439.55
Payments received since last invoice	\$4,048.15
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$21,391.40</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

10/14/2020	SDL	Correspondence with Lender regarding financing.	0.10 hrs	420 /hr	42.00
10/16/2020	JMR	Draft 5th Stipulation under Financing Order (.3); correspondence with Trustee on same (.1)	0.40 hrs	560 /hr	224.00
10/17/2020	JMR	Correspondence with T. Scannell on stipulation regard order deadlines (.2)	0.20 hrs	560 /hr	112.00
10/19/2020	JMR	Correspondence with T. Scannell regarding extension of finance order deadlines (.2); finalize and file stipulation on same (.2)	0.40 hrs	560 /hr	224.00
10/20/2020	JMR	Correspondence on budget variance reporting (0.2)	0.20 hrs	560 /hr	112.00
10/21/2020	JMR	Correspondence with G. Milligan regarding funding update and related financing order analysis (.3); analysis of order on same (.4)	0.70 hrs	560 /hr	392.00
Total fees for this matter			<u>2.00 hrs</u>		<u>1,106.00</u>

Greg Milligan as proposed ch 11 trustee of  
3443 Zen Garden LP  
For Professional Services Rendered

Page 1  
Invoice No: 128956  
Invoice through: 10/31/2020

**BILLING SUMMARY**

TOTAL FEES	\$1,106.00
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$1,106.00
NET BALANCE FORWARD	\$21,391.40
TOTAL BALANCE NOW DUE	\$22,497.40

**Timekeeper Summary**

Name		Hours	Rate	Amount
Partner	JMR Jason M Rudd	1.90	560.00	\$1,064.00
Associate	SDL Scott D. Lawrence	0.10	420.00	\$42.00
		2.00		\$1,106.00

**Required Notice to Clients.**

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(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

November 6, 2020

Invoice No: 128957  
Our File No: 7066-09 JMR  
Billing through: 10/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Case Administration

TOTAL FEES	\$1,468.50
TOTAL DISBURSEMENTS	\$1,634.14
TOTAL CHARGES FOR THIS BILL	<hr/> \$3,102.64
NET BALANCE FORWARD	\$840.50
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$3,943.14</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP  
Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

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Federal Tax No. 45-4183914

November 6, 2020

Invoice No. 128957  
Reference No. 7066-09 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Case Administration

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122445	06/22/2020	09	JMR	\$2,688.00	\$537.60
123576	07/06/2020	09	JMR	\$532.00	\$106.40
124862	08/06/2020	09	JMR	\$108.00	\$21.60
126137	09/03/2020	09	JMR	\$512.50	\$39.60
127394	10/07/2020	09	JMR	\$833.25	\$135.30
Total Outstanding Balance					\$840.50
Total Amount Due on this Invoice					\$3,102.64
Total Balance Now Due					<u>\$3,943.14</u>

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$135.30	\$0.00	\$39.60	\$21.60	\$644.00	\$840.50

Please remit payment within 30 days. Thank you!

**Wick Phillips Gould & Martin, LLP**

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Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

November 6, 2020

Invoice No: 128957  
Our File No: 7066-09 JMR  
Billing through: 10/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Case Administration**

Balance forward as of invoice dated 10/07/2020	\$1,538.45
Payments received since last invoice	\$697.95
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$840.50</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

10/01/2020	BR	Finalize notice of final sale order; file and serve re same.	1.10 hrs	165 /hr	181.50
10/02/2020	BR	Finalize witness and exhibit list and exhibits; file and serve re same.	0.90 hrs	165 /hr	148.50
10/12/2020	BR	Prepare ballot mailing list.	1.60 hrs	165 /hr	264.00
10/19/2020	BR	Finalize fifth stipulation; file re same; file monthly operating report; finalize plan and disclosure statement; file and serve re same.	2.60 hrs	165 /hr	429.00
10/20/2020	BR	Prepare certificates of service; file re same; prepare notice of hearing; file and serve re same; prepare witness and exhibit list for October 23 hearing.	1.60 hrs	165 /hr	264.00
10/22/2020	BR	Finalize witness and exhibit list and exhibits; file re same.	0.50 hrs	165 /hr	82.50
10/26/2020	BR	Finalize certificate of service; file re same and serve order re same.	0.60 hrs	165 /hr	99.00
Total fees for this matter			<u>8.90 hrs</u>		<u>1,468.50</u>

**DISBURSEMENTS**

10/01/2020	Postage. (BR)	26.50
10/01/2020	Copies (BR)	95.40
10/16/2020	Federal Court Reporters of San Antonio - Transcript	501.40
10/16/2020	Inventus - Binders, tabs & copies	555.59
10/17/2020	Special Delivery, Inc. - Process Serving	199.50
10/19/2020	Postage. (BR)	35.75

		Page	1
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP		Invoice No:	128957
For Professional Services Rendered		Invoice through:	10/31/2020
10/19/2020	Copies (BR)		121.00
10/20/2020	Postage. (BR)		27.50
10/20/2020	Copies (BR)		22.00
10/26/2020	Postage. (BR)		27.50
10/26/2020	Copies (BR)		22.00
Total disbursements for this matter			<u>\$1,634.14</u>

BILLING SUMMARY

TOTAL FEES	\$1,468.50
TOTAL DISBURSEMENTS	\$1,634.14
TOTAL CHARGES FOR THIS BILL	\$3,102.64
NET BALANCE FORWARD	\$840.50
TOTAL BALANCE NOW DUE	<span style="border: 1px solid black;">\$3,943.14</span>

Timekeeper Summary

Name	Hours	Rate	Amount
Legal      BR      Brenda Ramirez	8.90	165.00	\$1,468.50
Assistant	<u>8.90</u>		<u>\$1,468.50</u>

Required Notice to Clients.

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(214) 692-6200 phone  
(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

November 6, 2020

Invoice No: 128958  
Our File No: 7066-16 JMR  
Billing through: 10/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Litigation: Contested Matters and Adversary  
Proceedings

TOTAL FEES	\$10,456.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$10,456.00
NET BALANCE FORWARD	\$426.10
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$10,882.10</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

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Suite 500  
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(214) 692-6255  
Federal Tax No. 45-4183914

November 6, 2020

Invoice No. 128958  
Reference No. 7066-16 JMR

Greg Milligan  
Attn: Gregory S. Milligan

Litigation: Contested Matters and Adversary Proceedings

### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122440	06/22/2020	16	JMR	\$168.00	\$33.60
123566	07/06/2020	16	JMR	\$504.00	\$100.80
126128	09/03/2020	16	JMR	\$294.00	\$58.80
127389	10/07/2020	16	JMR	\$1,164.50	\$232.90
Total Outstanding Balance					\$426.10
Total Amount Due on this Invoice					\$10,456.00
Total Balance Now Due					\$10,882.10

### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$232.90	\$0.00	\$58.80	\$0.00	\$134.40	\$426.10

Please remit payment within 30 days. Thank you!



**Wick Phillips Gould & Martin, LLP**

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(214) 692-6255  
Federal Tax ID: 45-4183914

November 6, 2020

Invoice No: 128958  
Our File No: 7066-16 JMR  
Billing through: 10/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Litigation: Contested Matters and Adversary Proceedings**

Balance forward as of invoice dated 10/07/2020	\$1,357.70
Payments received since last invoice	\$931.60
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$426.10</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

10/02/2020	JMR	Strategy conference with N. Nelson to advance investigation of A-1 recovery claims (.3); analysis of documents received to date to inform same (.4)	0.70 hrs	560 /hr	392.00
10/02/2020	NBN	Correspond with R. Horton and A. Zarafshani regarding Structures report.	0.40 hrs	495 /hr	198.00
10/03/2020	NBN	Review docket to determine identity of witnesses designate by Dan White; conduct search of documents provided by Hinshaw for reference to these individuals; correspond with J. Rudd regarding same.	0.70 hrs	495 /hr	346.50
10/05/2020	NBN	Correspond with L. Randolph at Hinshaw regarding documents related to A-1 Engineering dispute; review documents provided by client; search documents previously produced by Hinshaw for information relevant to engineering dispute.	1.80 hrs	495 /hr	891.00
10/07/2020	NBN	Correspond with Hinshaw regarding documents related to A-1 Engineering dispute; coordinate accessing documents; prepare for and attend call with Hinshaw regarding same.	0.90 hrs	495 /hr	445.50
10/09/2020	NBN	Correspond with Hinshaw to obtain documents regarding A-1 Engineering project; review documents provided; review documents produced by Hinshaw previously and documents produced by A. Zarafshani.	1.80 hrs	495 /hr	891.00
10/12/2020	JMR	Conference with A. Zarafshani and R. Horton regarding background and assessment of A-1 and North American causes of actions and supporting information for same (.4); follow up call with G. Milligan on same (.1); correspondence with N.	0.60 hrs	560 /hr	336.00

			Page		1
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden L.P.			Invoice No:		128958
For Professional Services Rendered			Invoice through:		10/31/2020
		Nelson (.1)			
10/16/2020	NBN	Review documents produced by A. Zarafshani; prepare summary of most relevant documents.	2.50 hrs	495 /hr	1,237.50
10/18/2020	NBN	Review documents produced by A. Zarafshani; prepare summary of most relevant documents; prepare summary and analysis of same for client.	1.50 hrs	495 /hr	742.50
10/19/2020	NBN	Review documents produced by A. Zarafshani; review documents produced by Hinshaw; prepare analysis of same.	7.10 hrs	495 /hr	3,514.50
10/20/2020	JMR	Anlaysia of A-1 litigaiton claim assessment (.3); correspondence with N. Nelson on same (.1)	0.40 hrs	560 /hr	224.00
10/20/2020	NBN	Finalize analysis of A-1 Engineering and North American claims; review documents and case law; prepare summary of admissions related to Romspen; correspond with client regarding same.	2.50 hrs	495 /hr	1,237.50
Total fees for this matter			20.90 hrs		10,456.00

BILLING SUMMARY

TOTAL FEES	\$10,456.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	\$10,456.00
NET BALANCE FORWARD	\$426.10
TOTAL BALANCE NOW DUE	\$10,882.10

Timekeeper Summary

Name			Hours	Rate	Amount
Partner	JMR	Jason M Rudd	1.70	560.00	\$952.00
Partner	NBN	Nick B. Nelson	19.20	495.00	\$9,504.00
			20.90		\$10,456.00

Required Notice to Clients.

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## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200 phone  
(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

December 3, 2020

Invoice No: 130173  
Our File No: 7066-03 JMR  
Billing through: 11/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Asset Analysis and Recovery

TOTAL FEES	\$896.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$896.00
NET BALANCE FORWARD	\$6,725.30
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$7,621.30</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax No. 45-4183914

December 3, 2020

Invoice No. 130173  
Reference No. 7066-03 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Asset Analysis and Recovery

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122449	06/22/2020	03	JMR	\$13,166.00	\$2,633.20
123572	07/06/2020	03	JMR	\$4,118.50	\$823.70
124863	08/06/2020	03	JMR	\$1,097.85	\$213.20
126132	09/03/2020	03	JMR	\$7,320.50	\$1,464.10
127399	10/07/2020	03	JMR	\$5,728.00	\$1,145.60
128948	11/06/2020	03	JMR	\$2,227.50	\$445.50
Total Outstanding Balance					\$6,725.30
Total Amount Due on this Invoice					\$896.00
Total Balance Now Due					<u>\$7,621.30</u>

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$445.50	\$1,145.60	\$0.00	\$1,677.30	\$3,456.90	\$6,725.30

Please remit payment within 30 days. Thank you!

**Wick Phillips Gould & Martin, LLP**

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

December 3, 2020

Invoice No: 130173  
Our File No: 7066-03 JMR  
Billing through: 11/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Asset Analysis and Recovery**

Balance forward as of invoice dated 11/06/2020	\$8,507.30
Payments received since last invoice	\$1,782.00
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$6,725.30</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

11/05/2020	JMR	Analysis of collected data, document, schedules and related communications regarding all potential remaining assets and litigation claims to inform recovery and preservation options on same (1.6)	1.60 hrs	560 /hr	896.00
Total fees for this matter			<u>1.60 hrs</u>		<u>896.00</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 1 Invoice No: 130173 Invoice through: 11/30/2020
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**BILLING SUMMARY**

TOTAL FEES	\$896.00
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$896.00
NET BALANCE FORWARD	\$6,725.30
TOTAL BALANCE NOW DUE	\$7,621.30

**Timekeeper Summary**

Name	Hours	Rate	Amount
Partner JMR Jason M Rudd	1.60	560.00	\$896.00
	1.60		\$896.00

**Required Notice to Clients.**

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(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

December 3, 2020

Invoice No: 130174  
Our File No: 7066-04 JMR  
Billing through: 11/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Asset Disposition

TOTAL FEES	\$448.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$448.00
NET BALANCE FORWARD	\$21,731.00
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$22,179.00</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

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(214) 692-6200  
(214) 692-6255  
Federal Tax No. 45-4183914

December 3, 2020

Invoice No. 130174  
Reference No. 7066-04 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Asset Disposition

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122448	06/22/2020	04	JMR	\$3,370.00	\$674.00
123574	07/06/2020	04	JMR	\$7,966.00	\$1,593.20
124866	08/06/2020	04	JMR	\$7,938.00	\$1,587.60
126133	09/03/2020	04	JMR	\$22,578.17	\$4,470.40
127398	10/07/2020	04	JMR	\$44,507.50	\$8,901.50
128949	11/06/2020	04	JMR	\$22,521.50	\$4,504.30
Total Outstanding Balance					\$21,731.00
Total Amount Due on this Invoice					\$448.00
Total Balance Now Due					<u>\$22,179.00</u>

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$4,504.30	\$8,901.50	\$0.00	\$6,058.00	\$2,267.20	\$21,731.00

Please remit payment within 30 days. Thank you!



**Wick Phillips Gould & Martin, LLP**

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(214) 692-6255  
Federal Tax ID: 45-4183914

December 3, 2020

Invoice No: 130174  
Our File No: 7066-04 JMR  
Billing through: 11/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Asset Disposition**

Balance forward as of invoice dated 11/06/2020	\$39,748.20
Payments received since last invoice	\$18,017.20
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$21,731.00</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

11/02/2020	JMR	Correspondence on auction results questions from creditors (.3); attention to final auction and sale conclusion and follow up items (.5)	0.80 hrs	560 /hr	448.00
Total fees for this matter			<u>0.80 hrs</u>		<u>448.00</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 1 Invoice No: 130174 Invoice through: 11/30/2020
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**BILLING SUMMARY**

TOTAL FEES	\$448.00
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$448.00
NET BALANCE FORWARD	\$21,731.00
TOTAL BALANCE NOW DUE	\$22,179.00

**Timekeeper Summary**

Name	Hours	Rate	Amount
Partner JMR Jason M Rudd	0.80	560.00	\$448.00
	0.80		\$448.00

**Required Notice to Clients.**

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Federal Tax No: 45-4183914

December 3, 2020

Invoice No: 130175  
Our File No: 7066-10 JMR  
Billing through: 11/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Claims Administration and Objections

TOTAL FEES	\$29,627.50
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$29,627.50
NET BALANCE FORWARD	\$1,281.70
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$30,909.20</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP  
Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

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(214) 692-6255  
Federal Tax No. 45-4183914

December 3, 2020

Invoice No. 130175  
Reference No. 7066-10 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Claims Administration and Objections

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122444	06/22/2020	10	JMR	\$630.00	\$126.00
123581	07/06/2020	10	JMR	\$1,713.00	\$342.60
124867	08/06/2020	10	JMR	\$280.00	\$56.00
126140	09/03/2020	10	JMR	\$1,064.00	\$212.80
127392	10/07/2020	10	JMR	\$2,735.53	\$510.70
128953	11/06/2020	10	JMR	\$168.00	\$33.60
Total Outstanding Balance					\$1,281.70
Total Amount Due on this Invoice					\$29,627.50
Total Balance Now Due					\$30,909.20

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$33.60	\$510.70	\$0.00	\$268.80	\$468.60	\$1,281.70

Please remit payment within 30 days. Thank you!

**Wick Phillips Gould & Martin, LLP**

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(214) 692-6255  
Federal Tax ID: 45-4183914

December 3, 2020

Invoice No: 130175  
Our File No: 7066-10 JMR  
Billing through: 11/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Claims Administration and Objections**

Balance forward as of invoice dated 11/06/2020	\$1,416.10
Payments received since last invoice	\$134.40
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$1,281.70</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

11/04/2020	JMR	Correspondence to advance payment of Receiver allowed admin claim with counsel and Trustee (.4).	0.40 hrs	560 /hr	224.00
11/04/2020	JMR	Draft NDA for exchanging Panache claim settlement information (.9); correspondence with G. Milligan on same (.2)	1.10 hrs	560 /hr	616.00
11/04/2020	JMR	Analysis of large claims to inform allowance ranges (.6); correspondence with trustee team on same (.2); analysis of Symmtry claim information and research prior records on same (.8)	1.60 hrs	560 /hr	896.00
11/05/2020	JMR	Correspondence with T. Scannell and R. Horton regarding NDA for exchanging Panache claim settlement information (.3)	0.30 hrs	560 /hr	168.00
11/07/2020	JMR	Conference call with potential White counsel on status of claims and case (.3); correspondence with G. Milligan on same (.3); outline options to deal with same (.5)	1.10 hrs	560 /hr	616.00
11/10/2020	JMR	Correspondence with K. Mercer regarding settlement of M&M claims with Rompsen (.2); telephone conference with K. Mercer on same (.3) Analysis of draft judgment and orders on same (.4); analysis of related complaint to inform same and assess impact on estate claims, plan and Rompsen settlement (.4); draft email memo to G. Milligan with analysis and recommendations (.4); correspondence with R. Horton on same (.1); correspondence with T. Scannell on same (.2); follow up correspondence with G. Milligan (.2); analysis of information supporting Symmetry claim (.5); draft follow up request to B.Duke on same (.3)	3.00 hrs	560 /hr	1,680.00

			Page		1
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP			Invoice No:		130175
For Professional Services Rendered			Invoice through:		11/30/2020
11/11/2020	JMR	Correspondence with K. Mercer and court regarding settlement on M&M adversary and related issue (.3); correspondance with court on same (.2); strategy conference with K. Mercer on final settlement issues (.3); correspondence with G. Milligan on same (.2); telephone conference with G. Milligan on same (.3)	1.30 hrs	560 /hr	728.00
11/11/2020	SDL	Begin preparation of objections to putative Class 5 claims.	0.80 hrs	420 /hr	336.00
11/12/2020	SDL	Continue drafting objections to Class 5 claims.	1.40 hrs	420 /hr	588.00
11/13/2020	JMR	Correspondence with S. Lawrence regarding objections to secured claims and strategy on same (.5); outline issues to address in same (.5); review and inital comments on drafts of same (.9)	1.90 hrs	560 /hr	1,064.00
11/13/2020	SDL	Review schedules and proofs of claim to prepare factual information for inclusion in objections to Class 5 claims (.7); review sale order, stipulations, and other documents relevant to argument in support of objections to Class 5 claims (.8); research forms for objection to secured claim (.6); research legal standard for determining valuation of secured claim in a claim objection (1.3); review service of relevant documents for inclusion in objections (.7); continue drafting and revising form objection to claim (3.1); draft proposed order granting same (.8); draft declaration in support of same (.9).	7.90 hrs	420 /hr	3,318.00
11/16/2020	JMR	Extensive analysis and comment on draft objections to secured claims and related Class 5 issues (1.8); correspondence with trustee on same (.4); analysis of additional information on Symmetry request for late claim (.6); analysis of revised claim and class information (.6)	3.40 hrs	560 /hr	1,904.00
11/16/2020	SDL	Call with Trustee, E. White, and J. Rudd regarding objections to claims.	0.50 hrs	420 /hr	210.00
11/17/2020	JMR	Analysis of updated filings and orders in advance of hearing on M&M adversary against Romspen and related settlements (.5); appear for hearing on same (.6); draft email update to G. Milligan on same and related next steps (.4)	1.50 hrs	560 /hr	840.00
11/18/2020	JMR	Analysis of judgment and registry funds release from M&M adversary (.3); correspondence with G. Milligan on same (.3); telephone conference with WDTX court finance administrator to advance payment of funds to the trustee per orders (.4); research and draft memo email to G. Milligan with instructions for same (.7)	1.70 hrs	560 /hr	952.00
11/18/2020	JMR	Telephone conference with B. Emerson (Schindler counsel) regarding sale of collateral and impact on claim (.3); analysis of claim documents to advance resolution of same (.7); respond to questions from G. Milligan on same (.3)	1.30 hrs	560 /hr	728.00
11/19/2020	JMR	Correspondence with K. Mercer on registry funds release (.2); review G. Milligan drafts on same (.3); correspondence with G. Milligan on same (.2)	0.70 hrs	560 /hr	392.00
11/19/2020	SDL	Revisions to form of objection to secured claims.	1.30 hrs	420 /hr	546.00

			Page		2
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP			Invoice No:		130175
For Professional Services Rendered			Invoice through:		11/30/2020
11/20/2020	JMR	Correspondence on advancing objections to claims and analysis supporting same (0.8); portion of trustee team call on same (.2)	1.00 hrs	560 /hr	560.00
11/20/2020	JMR	Telephone conference with D. White counsel B. Duke regarding Symmetry claim support (.2); analysis of information on same (.5); correspondence on same (.4); call with trustee on same (.3); correspondence on Panche questions on claim issues (.3)	1.70 hrs	560 /hr	952.00
11/20/2020	SDL	Draft and revise objection to secured claim of Roca with proposed order and declaration in support (1.4); review service of documents on Roca, Roca service addresses, and related documents to draft portions of Roca secured claim objection (.4); call with Trustee, E. White, and J. Rudd regarding claims objections (.2); revisions to form secured claim objection (.6); draft and revise objection to secured claim of H&H Crane with proposed order and declaration in support (1.1); draft and revise objection to secured claim of Lone Star Materials with proposed order and declaration in support (.9); draft and revise objection to secured claim of Dealer's Electrical Supply Company with proposed order and declaration in support (.9); draft and revise objection to secured claim of Ram Tool Supply with proposed order and declaration in support (.8); draft and revise objection to secured claim of Wembley Metal Buildings with proposed order and declaration in support (1.0); draft and revise objection to secured claim of Schindler Elevator with proposed order and declaration in support (1.4); draft and revise objection to secured claim of Hinshaw with proposed order and declaration in support (.9); draft and revise objection to secured claim of Trane with proposed order and declaration in support (.5).	10.10 hrs	420 /hr	4,242.00
11/22/2020	JMR	Analysis and review of draft objections, orders and declarations regarding Lone Star, Dealers, Ram, Schindler, Roca, H&H, Trane, Hinshaw, Wembly, and related claim (3.3)	3.30 hrs	560 /hr	1,848.00
11/23/2020	BR	Finalize claim objections.	0.70 hrs	165 /hr	115.50
11/23/2020	JMR	Analysis of Romspen claim assessment to inform disclosure statement on same (.5); correspondence with trustee and E. White on same (.3)	0.80 hrs	560 /hr	448.00
11/23/2020	SDL	Call with J. Rudd regarding revisions to objections to secured claims (.2); correspondence to B. Ramirez regarding same (.1); revisions to objections to secured claims of Ram Tool, H&H Crane, Roca, and Lone Star to finalize same (1.2); revisions to objection to claims of Dealers Electric (.5); call with Trustee, E. White, and J. Rudd regarding same (.4).	2.30 hrs	420 /hr	966.00
11/24/2020	JMR	Analysis of Symmetry claim documents from B. Duke and A. Zarafshani (.9); correspondence with B. Duke on same (.3)	1.20 hrs	560 /hr	672.00
11/24/2020	SDL	Finalize objection to Roca claim (.3); finalize objection to Dealer's claim (.3); finalize objection to H&H claim (.3); finalize objection to Lone Star claim	2.70 hrs	420 /hr	1,134.00

		Page		3	
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP		Invoice No:		130175	
For Professional Services Rendered		Invoice through:		11/30/2020	
	(.3); finalize objection to Ram Tool claim (.3); call and correspondences with assistant regarding same (.4); draft and finalize supplemental certificates of service regarding Roca, Dealer's and Lone Star objections (.4); call and correspondence with and regarding Dealer's Electric objection (.4).				
11/25/2020	JMR	Correspondence on Trane secured claims (.2); Analysis of new information from A. Zarafshani regarding Symmetry claim and related White Party transactions (.6); correspondence on same (.2)	1.00 hrs	560 /hr	560.00
11/28/2020	JMR	Review updated claims analysis to advance objections and inform disclosure statement hearing (1.1)	1.10 hrs	560 /hr	616.00
11/30/2020	JMR	Telephone conference with Trane counsel regarding status of claim (.3); telephone conference with Schindler counsel on resolution of claim (.2); correspondence with Hinshaw on same (.3); correspondence with trustee with update (.2); correspondence on resolution of Dealers supply claim (.1)	1.10 hrs	560 /hr	616.00
11/30/2020	SDL	Revisions to claims objections regarding Schindler, Wembley, Hinshaw and Trane claims (1.8); draft proposed order resolving Schindler claim objection and modifying stay to permit sale (.8).	2.60 hrs	420 /hr	1,092.00
Total fees for this matter			60.80 hrs		29,627.50



Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 4 Invoice No: 130175 Invoice through: 11/30/2020
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**BILLING SUMMARY**

TOTAL FEES	\$29,627.50
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$29,627.50
NET BALANCE FORWARD	\$1,281.70
TOTAL BALANCE NOW DUE	\$30,909.20

**Timekeeper Summary**

Name			Hours	Rate	Amount
Legal Assistant	BR	Brenda Ramirez	0.70	165.00	\$115.50
Partner	JMR	Jason M Rudd	30.50	560.00	\$17,080.00
Associate	SDL	Scott D. Lawrence	29.60	420.00	\$12,432.00
			60.80		\$29,627.50

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Federal Tax No: 45-4183914

December 3, 2020

Invoice No: 130176  
Our File No: 7066-15 JMR  
Billing through: 11/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Financing and Cash Collateral

TOTAL FEES	\$2,968.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$2,968.00
NET BALANCE FORWARD	\$21,612.60
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$24,580.60</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

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Federal Tax No. 45-4183914

December 3, 2020

Invoice No. 130176  
Reference No. 7066-15 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Financing and Cash Collateral

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122441	06/22/2020	15	JMR	\$52,173.50	\$10,434.70
123580	07/06/2020	15	JMR	\$34,250.50	\$6,850.10
124870	08/06/2020	15	JMR	\$7,387.50	\$1,477.50
126125	09/03/2020	15	JMR	\$9,171.00	\$1,834.20
127387	10/07/2020	15	JMR	\$4,843.05	\$794.90
128956	11/06/2020	15	JMR	\$1,106.00	\$221.20
Total Outstanding Balance					\$21,612.60
Total Amount Due on this Invoice					\$2,968.00
Total Balance Now Due					<u>\$24,580.60</u>

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$221.20	\$794.90	\$0.00	\$3,311.70	\$17,284.80	\$21,612.60

Please remit payment within 30 days. Thank you!

**Wick Phillips Gould & Martin, LLP**

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(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

December 3, 2020

Invoice No: 130176  
Our File No: 7066-15 JMR  
Billing through: 11/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Financing and Cash Collateral**

Balance forward as of invoice dated 11/06/2020	\$22,497.40
Payments received since last invoice	\$884.80
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$21,612.60</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

11/17/2020	JMR	Analysis of budget update from E. White (.4); analysis of final financing order on same (.4); correspondence with trustee team on same (.3)	1.10 hrs	560 /hr	616.00
11/18/2020	JMR	Analysis of updated cash collateral accounting and budgeting (.6); correspondence with E. White and G. Milligan on same (.3)	0.90 hrs	560 /hr	504.00
11/18/2020	JMR	Analysis of post-petition financing calculations (.4); correspondence with G. Miligan and E. White on same (.3); correspondence with T. Scannell on same (.4)	1.10 hrs	560 /hr	616.00
11/19/2020	JMR	Analysis of Rompsen post-petition loan payoff from T. Scannell and supporting documents (.5); correspondence with T. Scannell (.3); correspondence with E. White and G. Milligan on same (.4)	1.20 hrs	560 /hr	672.00
11/20/2020	JMR	Correspondence with Trustee team regarding post petition loan calculation (.3); analysis of calculations and documents on same (.7)	1.00 hrs	560 /hr	560.00
Total fees for this matter			<u>5.30 hrs</u>		<u>2,968.00</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 1 Invoice No: 130176 Invoice through: 11/30/2020
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**BILLING SUMMARY**

TOTAL FEES	\$2,968.00
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$2,968.00
NET BALANCE FORWARD	\$21,612.60
TOTAL BALANCE NOW DUE	\$24,580.60

Timekeeper Summary

Name	Hours	Rate	Amount
Partner JMR Jason M Rudd	5.30	560.00	\$2,968.00
	5.30		\$2,968.00

Required Notice to Clients.

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Federal Tax No: 45-4183914

December 3, 2020

Invoice No: 130177  
Our File No: 7066-16 JMR  
Billing through: 11/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Litigation: Contested Matters and Adversary  
Proceedings

TOTAL FEES	\$5,754.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$5,754.00
NET BALANCE FORWARD	\$2,517.30
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$8,271.30</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP  
Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax No. 45-4183914

December 3, 2020

Invoice No. 130177  
Reference No. 7066-16 JMR

Greg Milligan  
Attn: Gregory S. Milligan

Litigation: Contested Matters and Adversary Proceedings

### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122440	06/22/2020	16	JMR	\$168.00	\$33.60
123566	07/06/2020	16	JMR	\$504.00	\$100.80
126128	09/03/2020	16	JMR	\$294.00	\$58.80
127389	10/07/2020	16	JMR	\$1,164.50	\$232.90
128958	11/06/2020	16	JMR	\$10,456.00	\$2,091.20
Total Outstanding Balance					\$2,517.30
Total Amount Due on this Invoice					\$5,754.00
Total Balance Now Due					<u>\$8,271.30</u>

### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$2,091.20	\$232.90	\$0.00	\$58.80	\$134.40	\$2,517.30

Please remit payment within 30 days. Thank you!

**Wick Phillips Gould & Martin, LLP**

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

December 3, 2020

Invoice No: 130177  
Our File No: 7066-16 JMR  
Billing through: 11/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Litigation: Contested Matters and Adversary Proceedings**

Balance forward as of invoice dated 11/06/2020	\$10,882.10
Payments received since last invoice	\$8,364.80
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$2,517.30</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

11/16/2020	JMR	Portion of trustee team call with N. Nelson to address A1/North America claim and related issues (.4); analysis of documents and memo from N. Nelson on same (.6); correspondence with N. Nelson and Trustee on same (.3)	1.30 hrs	560 /hr	728.00
11/16/2020	NBN	Prepare for and attend call with client regarding strategy for sale of certain claims; review documents produced by A. Zarafshani; correspond with counsel for A. Zarafshani.	1.30 hrs	495 /hr	643.50
11/16/2020	SDL	Call with Trustee, N. Nelson, J. Rudd and E. White regarding pursuit of estate claims.	0.20 hrs	420 /hr	84.00
11/18/2020	NBN	Prepare letter to counsel for A. Zarafshani regarding possible sale of claims against A-1 engineering and other parties; review documents produced by Hinshaw and A. Zarafshani; correspond with J. Rudd; coordinate service of letter.	2.40 hrs	495 /hr	1,188.00
11/19/2020	JMR	Analysis and comment on A-1/NA claim collection request (.3); correspondence with N. Nelson and G. Milligan on same (.3)	0.60 hrs	560 /hr	336.00
11/20/2020	JMR	Analysis of A-1 claim update analysis and offer letter (.3); portion of trustee team call on same (.2)	0.50 hrs	560 /hr	280.00
11/20/2020	NBN	Finalize settlement proposal to A. Zarafshani regarding A-1 Engineering claims; coordinate service of same.	0.60 hrs	495 /hr	297.00
11/23/2020	NBN	Prepare for and attend strategy call with client; correspond with J. Henry regarding background of communications with A1 and North American insurance carriers.	1.60 hrs	495 /hr	792.00



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Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP			Invoice No:		130177
For Professional Services Rendered			Invoice through:		11/30/2020
11/24/2020	NBN	Attend strategy call with client; review documents produced by Hinshaw to determine if Green Bank letter or White financial statements were produced; review disclosure statement to confirm details related to claims against Romspen.	2.50 hrs	495 /hr	1,237.50
11/30/2020	JMR	Correspondence on A-1/NAE claim with Trustee team and A. Zarafshani (.3)	0.30 hrs	560 /hr	168.00
Total fees for this matter			11.30 hrs		5,754.00

**BILLING SUMMARY**

TOTAL FEES	\$5,754.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	\$5,754.00
NET BALANCE FORWARD	\$2,517.30
TOTAL BALANCE NOW DUE	\$8,271.30

**Timekeeper Summary**

Name			Hours	Rate	Amount
Partner	JMR	Jason M Rudd	2.70	560.00	\$1,512.00
Partner	NBN	Nick B. Nelson	8.40	495.00	\$4,158.00
Associate	SDL	Scott D. Lawrence	0.20	420.00	\$84.00
			11.30		\$5,754.00

**Required Notice to Clients.**

THE STATE BAR OF TEXAS INVESTIGATES AND PROSECUTES PROFESSIONAL MISCONDUCT COMMITTED BY TEXAS ATTORNEYS. ALTHOUGH NOT EVERY COMPLAINT AGAINST OR DISPUTE WITH A LAWYER INVOLVES PROFESSIONAL MISCONDUCT, THE STATE BAR'S OFFICE OR GENERAL COUNSEL WILL PROVIDE YOU WITH INFORMATION ABOUT HOW TO FILE A COMPLAINT. PLEASE CALL 1-800-932-1900 TOLL-FREE FOR MORE INFORMATION.

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(214) 692-6200 phone  
(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

December 3, 2020

Invoice No: 130178  
Our File No: 7066-17 JMR  
Billing through: 11/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Meetings and Communications with Creditors

TOTAL FEES	\$1,680.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$1,680.00
NET BALANCE FORWARD	\$982.80
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$2,662.80</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP  
Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax No. 45-4183914

December 3, 2020

Invoice No. 130178  
Reference No. 7066-17 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Meetings and Communications with Creditors

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122439	06/22/2020	17	JMR	\$2,072.00	\$414.40
123573	07/06/2020	17	JMR	\$1,218.00	\$243.60
124871	08/06/2020	17	JMR	\$770.00	\$154.00
126139	09/03/2020	17	JMR	\$168.00	\$33.60
128951	11/06/2020	17	JMR	\$686.00	\$137.20
Total Outstanding Balance					\$982.80
Total Amount Due on this Invoice					\$1,680.00
Total Balance Now Due					\$2,662.80

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$137.20	\$0.00	\$0.00	\$187.60	\$658.00	\$982.80

Please remit payment within 30 days. Thank you!

**Wick Phillips Gould & Martin, LLP**

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Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

December 3, 2020

Invoice No: 130178  
Our File No: 7066-17 JMR  
Billing through: 11/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

Meetings and Communications with Creditors

Balance forward as of invoice dated 11/06/2020	\$1,531.60
Payments received since last invoice	\$548.80
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$982.80</u>
Trust balance carried forward	\$0.00

FOR PROFESSIONAL SERVICES RENDERED

11/02/2020	JMR	Correspondence with A. Zarafshani regarding creditor and court contact with creditors (.3)	0.30 hrs	560 /hr	168.00
11/02/2020	JMR	Correspondence with A. Chiarello regarding admin claim payment and treatment (.3); correspondence with T. Scannell on same (.3)	0.60 hrs	560 /hr	336.00
11/03/2020	JMR	Extensive telephone conference with T. Scannell regarding M&M adversary negotiations, Panache claim settlement, and related case developments, strategy and next steps (.6); memo update to G. Milligan on same (.4)	1.00 hrs	560 /hr	560.00
11/20/2020	JMR	Telephone conference with Trane counsel regarding claim issue (.4); correspondence on same (.4); analysis of supporting document to inform discussion (.3)	1.10 hrs	560 /hr	616.00
Total fees for this matter			<u>3.00 hrs</u>		<u>1,680.00</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 1 Invoice No: 130178 Invoice through: 11/30/2020
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**BILLING SUMMARY**

TOTAL FEES	\$1,680.00
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$1,680.00
NET BALANCE FORWARD	\$982.80
TOTAL BALANCE NOW DUE	\$2,662.80

**Timekeeper Summary**

Name	Hours	Rate	Amount
Partner JMR Jason M Rudd	3.00	560.00	\$1,680.00
	3.00		\$1,680.00

**Required Notice to Clients.**

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Federal Tax No: 45-4183914

December 3, 2020

Invoice No: 130179  
Our File No: 7066-13 JMR  
Billing through: 11/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Employment and Fee Applications

TOTAL FEES	\$13,568.50
TOTAL DISBURSEMENTS	\$929.80
TOTAL CHARGES FOR THIS BILL	<hr/> \$14,498.30
NET BALANCE FORWARD	\$15,518.84
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$30,017.14</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP  
Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

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Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax No. 45-4183914

December 3, 2020

Invoice No. 130179  
Reference No. 7066-13 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Employment and Fee Applications

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122443	06/22/2020	13	JMR	\$23,797.72	\$4,759.54
123578	07/06/2020	13	JMR	\$32,256.00	\$6,451.20
124868	08/06/2020	13	JMR	\$4,137.00	\$827.40
126138	09/03/2020	13	JMR	\$7,561.50	\$1,512.30
127402	10/07/2020	13	JMR	\$2,464.00	\$492.80
128946	11/06/2020	13	JMR	\$7,378.00	\$1,475.60
Total Outstanding Balance					\$15,518.84
Total Amount Due on this Invoice					\$14,498.30
Total Balance Now Due					<u>\$30,017.14</u>

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$1,475.60	\$492.80	\$0.00	\$2,339.70	\$11,210.74	\$15,518.84

Please remit payment within 30 days. Thank you!

**Wick Phillips Gould & Martin, LLP**

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

December 3, 2020

Invoice No: 130179  
Our File No: 7066-13 JMR  
Billing through: 11/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Employment and Fee Applications**

Balance forward as of invoice dated 11/06/2020	\$21,421.24
Payments received since last invoice	\$5,902.40
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$15,518.84</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

11/02/2020	JMR	Correspondence with S. Lawrence to address initial input, quesitons and comment on draft fee applications (.3)	0.30 hrs	560 /hr	168.00
11/02/2020	SDL	Additional revisions to Sprouse fee application (.4); additional revisions to Harney Partners fee application (.5); additional revisions to Wick Phillips fee application (1.3); draft and revise fee application for Trustee (2.5); develop calculation of Trustee fee and disbursements total (.8).	5.50 hrs	420 /hr	2,310.00
11/03/2020	JMR	Extensive revisions to first interim fee applications for all trustee professionals (2.2); correspondence with trustee team on same (.3)	2.50 hrs	560 /hr	1,400.00
11/03/2020	SDL	Additional revisions to Wick Phillips fee application and call and correspondence with J. Rudd regarding same.	0.80 hrs	420 /hr	336.00
11/04/2020	SDL	Revisions to Wick Phillips fee application (1.1); additional analysis of invoices for calculations (.5); correspondence to client and J. Rudd regarding same (.3); analysis and correspondence to J. Rudd regarding Trustee fee application (.1).	2.00 hrs	420 /hr	840.00
11/05/2020	SDL	Correspondence to Trustee regarding Trustee fee application requirements (.1);	0.10 hrs	420 /hr	42.00
11/06/2020	BR	Prepare exhibits for applications.	1.30 hrs	165 /hr	214.50
11/06/2020	SDL	Finalize drafts of Trustee fee application (1.4); Harney Partners fee application (1.1); Sprouse fee application (1.2); continue revisions to Wick Phillips application (.8).	4.50 hrs	420 /hr	1,890.00
11/09/2020	JMR	Final revisions and review of Trustee, Harney, Wick	1.60 hrs	560 /hr	896.00



			Page		1	
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP			Invoice No:		130179	
For Professional Services Rendered			Invoice through:		11/30/2020	
11/09/2020	SDL	Phillips and Sprouse fee applications (1.3); strategy call with S. Lawrence on same (.3) Calls with J. Rudd regarding revisions to Wick Phillips fee application (.4); review and revise analysis of invoices, billings, and amounts due to locate source of discrepancies between various records (3.2); implement revisions based on analysis and re-circulate (.7).	4.30	hrs	420 /hr	1,806.00
11/10/2020	BR	Finalize Harney Partners, Sprouse Shrader, WPGM, and Trustee's fee applications; file and serve re same.	4.40	hrs	165 /hr	726.00
11/10/2020	JMR	Draft and serve October monthly fee statement for Harney and WP (.5); correspondence with T. Scannell on same (.3)	0.80	hrs	560 /hr	448.00
11/10/2020	JMR	Correspondence on approval and filing of fee applications (.5); final review and comment on same (.6); telephone conference with S. Lawrence on same (.2)	1.30	hrs	560 /hr	728.00
11/10/2020	SDL	Finalize Sprouse fee application (.8); Harney fee application (.7); Trustee fee application (.7); and Wick Phillips fee application (1.9) for filing.	4.10	hrs	420 /hr	1,722.00
11/12/2020	SDL	Correspondence to T. Irion regarding fee application status.	0.10	hrs	420 /hr	42.00
Total fees for this matter			33.60	hrs		13,568.50

DISBURSEMENTS

11/12/2020	Postage. (BR)	116.60
11/12/2020	Copies: WPGM Application \$222.60 (BR)	222.60
11/12/2020	Copies: Harney Application \$212.00 (BR)	212.00
11/12/2020	Copies: Trustee Application \$124.20 (BR)	124.20
11/12/2020	Copies: Sprouse Application \$254.40 (BR)	254.40
Total disbursements for this matter		\$929.80

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 2 Invoice No: 130179 Invoice through: 11/30/2020
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**BILLING SUMMARY**

TOTAL FEES	\$13,568.50
TOTAL DISBURSEMENTS	\$929.80
 TOTAL CHARGES FOR THIS BILL	 \$14,498.30
NET BALANCE FORWARD	\$15,518.84
TOTAL BALANCE NOW DUE	\$30,017.14

Timekeeper Summary

Name			Hours	Rate	Amount
Legal Assistant	BR	Brenda Ramirez	5.70	165.00	\$940.50
Partner	JMR	Jason M Rudd	6.50	560.00	\$3,640.00
Associate	SDL	Scott D. Lawrence	21.40	420.00	\$8,988.00
			33.60		\$13,568.50

Required Notice to Clients.

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Dallas, TX 75204  
(214) 692-6200 phone  
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Federal Tax No: 45-4183914

December 3, 2020

Invoice No: 130180  
Our File No: 7066-19 JMR  
Billing through: 11/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Plan and Disclosure Statement

TOTAL FEES	\$36,973.50
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$36,973.50
NET BALANCE FORWARD	\$27,911.86
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$64,885.36</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

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Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax No. 45-4183914

December 3, 2020

Invoice No. 130180  
Reference No. 7066-19 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Plan and Disclosure Statement

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122437	06/22/2020	19	JMR	\$7,586.50	\$1,517.06
123571	07/06/2020	19	JMR	\$9,871.00	\$1,974.20
124859	08/06/2020	19	JMR	\$18,111.00	\$3,622.20
126129	09/03/2020	19	JMR	\$10,318.00	\$2,063.60
127390	10/07/2020	19	JMR	\$33,810.00	\$6,762.00
128954	11/06/2020	19	JMR	\$59,864.00	\$11,972.80
Total Outstanding Balance					\$27,911.86
Total Amount Due on this Invoice					\$36,973.50
Total Balance Now Due					<u>\$64,885.36</u>

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$11,972.80	\$6,762.00	\$0.00	\$5,685.80	\$3,491.26	\$27,911.86

Please remit payment within 30 days. Thank you!

**Wick Phillips Gould & Martin, LLP**

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Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

December 3, 2020

Invoice No: 130180  
Our File No: 7066-19 JMR  
Billing through: 11/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Plan and Disclosure Statement**

Balance forward as of invoice dated 11/06/2020	\$75,803.06
Payments received since last invoice	\$47,891.20
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$27,911.86</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

11/02/2020	JMR	Correspondence with T. Scannell regarding disclosure statement and related case issues (.4); analysis of issues outlined on same (.4)	0.80 hrs	560 /hr	448.00
11/04/2020	JMR	Analysis of comments and updates to DS and Plan (.9)	0.90 hrs	560 /hr	504.00
11/05/2020	JMR	Analysis of claims under 9019 factors and outline additions to DS regarding same (2.4); correspondence with K. Mercer on advance plan treatment settlements (0.2); correspondence with R. Horton on same (.2); analysis of alternative defecincy claim treatement options (.5)	3.30 hrs	560 /hr	1,848.00
11/07/2020	JMR	Analysis and comment on White Party related portions of Disclosure Statement and Plan (.8)	0.80 hrs	560 /hr	448.00
11/10/2020	JMR	Correspondence with K. Mercer on plan treatment negotiations (.3); correspondence with G. Milliganon same (.3)	0.60 hrs	560 /hr	336.00
11/11/2020	JMR	Analysis of background documents to revise and update plan and disclosure statement (.9); analysis of claim and litigation settlements and preservations on plan treatment and timing for confirmation and related planning issues (1.2); correspondence on same (.4); update recovery options on same (.4)	2.90 hrs	560 /hr	1,624.00
11/12/2020	JMR	Correspondence with T. Scannell on plan and disclosure statement (.2)	0.20 hrs	560 /hr	112.00
11/13/2020	JMR	Extensive review and comment on proposed Romspen disclosure statement and plan inserts (1.7); correspondence with T. Scannell on same (.3); telephone conference on same (.2); analysis of	3.80 hrs	560 /hr	2,128.00

		Page		1	
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP		Invoice No:		130180	
For Professional Services Rendered		Invoice through:		11/30/2020	
	credit bid, adversary and Romspen claim related information to inform same and related preparation of disclosure statement settlement supplements and revisions (1.6)				
11/16/2020	JMR	Portion of Trustee team call regarding advancing revisions to plan and disclosure statement (.5); continue to revise and update disclosure statement and plan to address 9019 analysis, new developments on claim resolutions and related issues (1.4); correspondence on same (.3)	2.20 hrs	560 /hr	1,232.00
11/16/2020	SDL	Call with Trustee, J. Rudd, and E. White to discuss plan, disclosure statement, next steps and scheduling for both.	0.20 hrs	420 /hr	84.00
11/17/2020	JMR	Strategy conference with T. Scannell on DS and Plan confirmation coordination and outstanding issues on same (.4); correspondence with G. Milligan on same (.3); analysis of remaining claim issues in plan and DS and outline means to resolve same (1.0); analysis of provisions on same (.8)	2.50 hrs	560 /hr	1,400.00
11/20/2020	JMR	Telephone conference with Trustee team to advance preparations of disclosure statement and related plan and party negotiations and issues (.4)	0.40 hrs	560 /hr	224.00
11/22/2020	JMR	Correspondence with G. Milligan regarding Dec. 1 hearing preparations and related issues (.2)	0.20 hrs	560 /hr	112.00
11/23/2020	JMR	Outline and comment on additions and update to disclosure statement (.9); Analysis of White parties objection and supporting Deloitte report (1.2); correspondence with T. Scannell on same (.3); draft outline of topics for trustee team call (.3); strategy conference with Trustee team on same (1.5); conference call with T. Scannell on same (.6)	4.80 hrs	560 /hr	2,688.00
11/23/2020	SDL	Call with Trustee regarding disclosure statement and preparation for hearing regarding same (.9); draft and revisions to Trust Agreement (1.6).	2.50 hrs	420 /hr	1,050.00
11/24/2020	JMR	Extensive revisions to Disclosure Statement to address objections, developments, Court and Trustee comments, among other supplements (4.5); analysis of documents to support same (.8); telephone conference with G. Milligan on same (.2); telephone conference with T. Scannell on inserts to disclosure statement (.2); correspondence with trustee team on disclosure statement revisions (.4)	6.10 hrs	560 /hr	3,416.00
11/24/2020	JMR	Call with A. Zarafshani and R. Horton on disclosure statement and plan related issue (.9); follow up call with G. Milligan (.2); analysis of new documents from A. Zarafshani on same (.5)	1.60 hrs	560 /hr	896.00
11/24/2020	SDL	Revisions to creditor trust agreement (4.8); call with Trustee, J. Rudd, R. Horton and A. Zarafshani regarding disclosure statement revisions (.5).	5.30 hrs	420 /hr	2,226.00
11/25/2020	JMR	Correspondence on T. Scannell DS and Plan comments (0.4); address same (.4); conference with G. Milligan and Trustee team on comments to disclosure statement revisions and approval (1.0); draft revisions, updates and refinements to plan (2.2); follow up call with T. Scannell on same (.2); comments to trust agreement, including G. Milligan	6.10 hrs	560 /hr	3,416.00

		Page		2	
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP		Invoice No:		130180	
For Professional Services Rendered		Invoice through:		11/30/2020	
	comments (.8); final approval of filing versions of each (.8); correspondence and approval of W&E list for hearing (.3)				
11/25/2020	SDL	Review and revise trust agreement (.6); begin draft of revised witness and exhibit list for hearing on disclosure statement (.1); call with Trustee, J. Rudd, E. White, and N. Nelson regarding revisions to disclosure statement (1.6); finalize trust agreement and circulate (.4); revisions to disclosure statement and circulate (4.1); call with J. Rudd regarding same (.1); finalize revised plan and disclosure statement (1.9); draft notice of revisions to same (.6); revisions to witness and exhibit list and exhibits (.5); correspondence with J. Rudd and Trustee regarding same (.2); correspondence with counsel to lender regarding same (.1).	10.20 hrs	420 /hr	4,284.00
11/28/2020	JMR	Analysis of final DS and Plan in advance of hearing on same (.9); outline arguments for same (.5)	1.40 hrs	560 /hr	784.00
11/29/2020	SDL	Review objection to disclosure statement and begin formulating response to same (1.1); Revisions to proposed order approving disclosure statement, scheduling confirmation hearing, and setting related deadlines, including draft of new ballot for Class 5 claimants and revisions to all other exhibits (3.7).	4.80 hrs	420 /hr	2,016.00
11/30/2020	BR	Prepare binder for 12/1 hearing; finalize notice of proposed order re solicitation procedures; file re same.	1.10 hrs	165 /hr	181.50
11/30/2020	JMR	Correspondence with White Parties counsel to advance discussions on objeciton resolutions (.4); revise proposed order and solicitation materials for submission in advance of hearing (.9); correspondence with S. Lawrence on same (.2); review and revise response to White Parties objection to DS (2.2); correspondence on same (.3); analysis of revisions to plan and DS, objections and court comments from last hearing in preparation of 12/1 hearings (1.8)	5.20 hrs	560 /hr	2,912.00
11/30/2020	SDL	Draft notice of revised proposed order for solicitation procedures motion (.4); continue draft and revisions to reply to objection to approval of disclosure statement (3.5); revisions to solicitation procedures and DS approval order (.4); revisions to notice of same (.1); correspondences and calls with B. Ramirez regarding finalizing same (.5); correspondence with J. Rudd regarding same (.1); finalize reply (1.2).	6.20 hrs	420 /hr	2,604.00
Total fees for this matter			74.10 hrs		36,973.50

Greg Milligan as proposed ch 11 trustee of  
3443 Zen Garden LP  
For Professional Services Rendered

Page 3  
Invoice No: 130180  
Invoice through: 11/30/2020

**BILLING SUMMARY**

TOTAL FEES	\$36,973.50
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	\$36,973.50
NET BALANCE FORWARD	\$27,911.86
TOTAL BALANCE NOW DUE	\$64,885.36

**Timekeeper Summary**

Name			Hours	Rate	Amount
Legal Assistant	BR	Brenda Ramirez	1.10	165.00	\$181.50
Partner	JMR	Jason M Rudd	43.80	560.00	\$24,528.00
Associate	SDL	Scott D. Lawrence	29.20	420.00	\$12,264.00
			74.10		\$36,973.50

**Required Notice to Clients.**

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## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200 phone  
(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

December 3, 2020

Invoice No: 130181  
Our File No: 7066-20 JMR  
Billing through: 11/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Real Estate

TOTAL FEES	\$504.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$504.00
NET BALANCE FORWARD	\$728.00
TOTAL BALANCE NOW DUE	<div>\$1,232.00</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

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Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax No. 45-4183914

December 3, 2020

Invoice No. 130181  
Reference No. 7066-20 JMR

Greg Milligan  
Attn: Gregory S. Milligan

Real Estate

### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122436	06/22/2020	20	JMR	\$1,008.00	\$201.60
124858	08/06/2020	20	JMR	\$728.00	\$145.60
126130	09/03/2020	20	JMR	\$1,624.00	\$324.80
127391	10/07/2020	20	JMR	\$280.00	\$56.00
Total Outstanding Balance					\$728.00
Total Amount Due on this Invoice					\$504.00
Total Balance Now Due					\$1,232.00

### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$0.00	\$56.00	\$0.00	\$470.40	\$201.60	\$728.00

Please remit payment within 30 days. Thank you!

Wick Phillips Gould & Martin, LLP

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(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

December 3, 2020

Invoice No: 130181  
Our File No: 7066-20 JMR  
Billing through: 11/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

Real Estate

Balance forward as of invoice dated 10/07/2020	\$952.00
Payments received since last invoice	\$224.00
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$728.00</u>
Trust balance carried forward	\$0.00

FOR PROFESSIONAL SERVICES RENDERED

11/18/2020	JMR	Correspondence with PDA counsel on approval of same and related document request (.3); analysis of PDA records to collect information submitted on same (.6)	0.90 hrs	560 /hr	504.00
Total fees for this matter			<u>0.90 hrs</u>		<u>504.00</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 1 Invoice No: 130181 Invoice through: 11/30/2020
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BILLING SUMMARY

TOTAL FEES	\$504.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	\$504.00
NET BALANCE FORWARD	\$728.00
TOTAL BALANCE NOW DUE	\$1,232.00

Timekeeper Summary

Name	Hours	Rate	Amount
Partner JMR Jason M Rudd	0.90	560.00	\$504.00
	0.90		\$504.00

Required Notice to Clients.

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Federal Tax No: 45-4183914

December 3, 2020

Invoice No: 130182  
Our File No: 7066-22 JMR  
Billing through: 11/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Reporting

TOTAL FEES	\$626.50
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$626.50
NET BALANCE FORWARD	\$1,897.90
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$2,524.40</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

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(214) 692-6255  
Federal Tax No. 45-4183914

December 3, 2020

Invoice No. 130182  
Reference No. 7066-22 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Reporting

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122442	06/22/2020	22	JMR	\$6,659.50	\$1,331.90
123570	07/06/2020	22	JMR	\$168.00	\$33.60
124856	08/06/2020	22	JMR	\$224.00	\$44.80
126127	09/03/2020	22	JMR	\$168.00	\$33.60
127395	10/07/2020	22	JMR	\$1,934.00	\$386.80
128950	11/06/2020	22	JMR	\$336.00	\$67.20
Total Outstanding Balance					\$1,897.90
Total Amount Due on this Invoice					\$626.50
Total Balance Now Due					<u>\$2,524.40</u>

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$67.20	\$386.80	\$0.00	\$78.40	\$1,365.50	\$1,897.90

Please remit payment within 30 days. Thank you!

Wick Phillips Gould & Martin, LLP

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(214) 692-6255  
Federal Tax ID: 45-4183914

December 3, 2020

Invoice No: 130182  
Our File No: 7066-22 JMR  
Billing through: 11/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

Reporting

Balance forward as of invoice dated 11/06/2020	\$2,166.70
Payments received since last invoice	\$268.80
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$1,897.90</u>
Trust balance carried forward	\$0.00

FOR PROFESSIONAL SERVICES RENDERED

11/20/2020	BR	File monthly operating report.	2.10 hrs	165 /hr	346.50
11/20/2020	JMR	Finalize and file MOR (.2)	0.20 hrs	560 /hr	112.00
11/20/2020	SDL	Review monthly operating report for October (.2); correspondence with Trustee, E. White and J. Rudd regarding same (.2).	0.40 hrs	420 /hr	168.00
Total fees for this matter			<u>2.70 hrs</u>		<u>626.50</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 1 Invoice No: 130182 Invoice through: 11/30/2020
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**BILLING SUMMARY**

TOTAL FEES	\$626.50
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$626.50
NET BALANCE FORWARD	\$1,897.90
TOTAL BALANCE NOW DUE	\$2,524.40

Timekeeper Summary

Name			Hours	Rate	Amount
Legal Assistant	BR	Brenda Ramirez	2.10	165.00	\$346.50
Partner	JMR	Jason M Rudd	0.20	560.00	\$112.00
Associate	SDL	Scott D. Lawrence	0.40	420.00	\$168.00
			2.70		\$626.50

Required Notice to Clients.

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Federal Tax No: 45-4183914

December 3, 2020

Invoice No: 130183  
Our File No: 7066-09 JMR  
Billing through: 11/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Case Administration

TOTAL FEES	\$168.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$168.00
NET BALANCE FORWARD	\$1,134.20
TOTAL BALANCE NOW DUE	<div>\$1,302.20</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

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Federal Tax No. 45-4183914

December 3, 2020

Invoice No. 130183  
Reference No. 7066-09 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Case Administration

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122445	06/22/2020	09	JMR	\$2,688.00	\$537.60
123576	07/06/2020	09	JMR	\$532.00	\$106.40
124862	08/06/2020	09	JMR	\$108.00	\$21.60
126137	09/03/2020	09	JMR	\$512.50	\$39.60
127394	10/07/2020	09	JMR	\$833.25	\$135.30
128957	11/06/2020	09	JMR	\$3,102.64	\$293.70
Total Outstanding Balance					\$1,134.20
Total Amount Due on this Invoice					\$168.00
Total Balance Now Due					<u>\$1,302.20</u>

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$293.70	\$135.30	\$0.00	\$61.20	\$644.00	\$1,134.20

Please remit payment within 30 days. Thank you!

**Wick Phillips Gould & Martin, LLP**

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(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

December 3, 2020

Invoice No: 130183  
Our File No: 7066-09 JMR  
Billing through: 11/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

Case Administration

Balance forward as of invoice dated 11/06/2020	\$3,943.14
Payments received since last invoice	\$2,808.94
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$1,134.20</u>
Trust balance carried forward	\$0.00

FOR PROFESSIONAL SERVICES RENDERED

11/20/2020	SDL	Review and revise service list and correspondence with B. Ramirez regarding additional revisions to same.	0.40 hrs	420 /hr	168.00
Total fees for this matter			<u>0.40 hrs</u>		<u>168.00</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP For Professional Services Rendered	Page 1 Invoice No: 130183 Invoice through: 11/30/2020
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**BILLING SUMMARY**

TOTAL FEES	\$168.00
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$168.00
NET BALANCE FORWARD	\$1,134.20
TOTAL BALANCE NOW DUE	\$1,302.20

**Timekeeper Summary**

Name		Hours	Rate	Amount	
Associate	SDL	Scott D. Lawrence	0.40	420.00	\$168.00
			0.40		\$168.00

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Federal Tax No: 45-4183914

December 3, 2020

Invoice No: 130184  
Our File No: 7066-01 JMR  
Billing through: 11/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: 3443 Zen Gardens Bankruptcy

TOTAL FEES	\$0.00
TOTAL DISBURSEMENTS	\$170.38
TOTAL CHARGES FOR THIS BILL	<hr/> \$170.38
NET BALANCE FORWARD	\$214.50
TOTAL BALANCE NOW DUE	<div>\$384.88</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

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Federal Tax No. 45-4183914

December 3, 2020

Invoice No. 130184  
Reference No. 7066-01 JMR

Greg Milligan  
Attn: Gregory S. Milligan

3443 Zen Gardens Bankruptcy

### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
122435	06/22/2020	01	JMR	\$972.96	\$214.50
Total Outstanding Balance					\$214.50
Total Amount Due on this Invoice					\$170.38
Total Balance Now Due					<u>\$384.88</u>

### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$0.00	\$0.00	\$0.00	\$0.00	\$214.50	\$214.50

Please remit payment within 30 days. Thank you!

**Wick Phillips Gould & Martin, LLP**

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Suite 500  
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(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

December 3, 2020

Invoice No: 130184  
Our File No: 7066-01 JMR  
Billing through: 11/30/2020

Greg Milligan  
Attn: Gregory S. Milligan

**3443 Zen Gardens Bankruptcy**

Balance forward as of invoice dated 11/06/2020	\$1,337.94
Payments received since last invoice	\$1,123.44
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$214.50</u>
Trust balance carried forward	\$0.00

**DISBURSEMENTS**

10/31/2020	Inventus - Oct Hosting	170.38
Total disbursements for this matter		<u>\$170.38</u>

**BILLING SUMMARY**

TOTAL FEES	\$0.00
TOTAL DISBURSEMENTS	\$170.38
TOTAL CHARGES FOR THIS BILL	\$170.38
NET BALANCE FORWARD	\$214.50
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$384.88</div>

**Required Notice to Clients.**

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Federal Tax No: 45-4183914

January 8, 2021

Invoice No: 131376  
Our File No: 7066-19 JMR  
Billing through: 12/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Plan and Disclosure Statement

TOTAL FEES	\$54,342.50
TOTAL DISBURSEMENTS	\$4,298.71
TOTAL CHARGES FOR THIS BILL	<hr/> \$58,641.21
NET BALANCE FORWARD	\$19,367.50
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$78,008.71</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

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Federal Tax No. 45-4183914

January 8, 2021

Invoice No. 131376  
Reference No. 7066-19 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Plan and Disclosure Statement

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
128954	11/06/2020	19	JMR	\$59,864.00	\$11,972.80
130180	12/03/2020	19	JMR	\$36,973.50	\$7,394.70
Total Outstanding Balance					\$19,367.50
Total Amount Due on this Invoice					\$58,641.21
Total Balance Now Due					\$78,008.71

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$0.00	\$7,394.70	\$11,972.80	\$0.00	\$0.00	\$19,367.50

Please remit payment within 30 days. Thank you!

**Wick Phillips Gould & Martin, LLP**

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(214) 692-6255  
Federal Tax ID: 45-4183914

January 8, 2021

Invoice No: 131376  
Our File No: 7066-19 JMR  
Billing through: 12/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Plan and Disclosure Statement**

Balance forward as of invoice dated 12/03/2020	\$64,885.36
Payments received since last invoice	\$45,517.86
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$19,367.50</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

12/01/2020	JMR	Outline issues to address in White Party settlement conference (.4); settlement conference with D. Williamson, B. Duke and T. Scannell to resolve DS objections and related issues (.6); post conference update and strategy call with G. Milligan (.3); strategy call with T. Scannell on DS hearing preparations and final planning (.5); outline arguments and final preparations for DS hearing (2.4); appear for and conduct DS hearing (1.5); follow up call with G. Milligan regarding next steps on plan confirmation (.4); review, revise and approve order on disclosure statement approval, solicitation procedures and related ballots and forms (.4); strategy discuss with N. Nelson on litigation strategy in advance of plan confirmation (.4)	6.90 hrs	560 /hr	3,864.00
12/01/2020	SDL	Review disclosure statement, objection, reply, and solicitation procedures motion in preparation for call with White Parties counsel to confer regarding hearing (.3); call to confer with White Parties (.6); review legal authority on claims estimation for voting purposes and draft correspondence to J. Rudd regarding same (.4); call with counsel for lender and J. Rudd regarding same (.4); begin preparations of proposed order for signature (.5); attend hearing on approval of disclosure statement and solicitation procedures (1.2); revisions to proposed order and exhibits thereto (2.5); correspondence with J. Rudd and Court regarding same (.1); correspondence with B. Ramirez regarding service of solicitation materials (.2); revisions to notice of hearing for	6.40 hrs	420 /hr	2,688.00

			Page		1
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP			Invoice No:		131376
For Professional Services Rendered			Invoice through:		12/31/2020
		service (.2).			
12/02/2020	BR	Prepare service of solicitation packages.	3.60 hrs	165 /hr	594.00
12/02/2020	JMR	Review and revise DS, plan and solicitation pack to addressing court comments, updates and final preparations of and service of DS and plan following hearing on same (3.3); extensive correspondence with S. Lawrence and B. Ramirez to advance same (.6)	3.90 hrs	560 /hr	2,184.00
12/02/2020	SDL	Finalize documents to include in Solicitation Packages (.3); review service list for Solicitation Packages (.2); draft detailed service instructions for Solicitation Packages, Notice of Confirmation Hearing, Ballots, Opt-Out Forms, and related documents (.8); follow up correspondence with B. Ramirez regarding service (.4).	1.60 hrs	420 /hr	672.00
12/03/2020	BR	Continue preparing service of solicitation packages; serve re same; prepare certificate of service re same.	8.30 hrs	165 /hr	1,369.50
12/03/2020	SDL	Additional correspondence with B. Ramirez regarding and review of documents and lists related to service of solicitation packages.	0.70 hrs	420 /hr	294.00
12/04/2020	BR	Finalize certificate of service for solicitation packages.	0.70 hrs	165 /hr	115.50
12/04/2020	JMR	Portion of trustee team call regarding advancing plan confirmation strategy (.5); discovery conference with D. Williamson and T. Scannell on same (.5); strategy call with N. Nelson and S. Lawrence on same (.3); analysis of document requests from D. Williamson (.3); follow up call with T. Scannell to coordinate same (.3)	1.90 hrs	560 /hr	1,064.00
12/04/2020	SDL	Call with Trustee and team regarding preparation for confirmation and other to do items (.7); call with J. Rudd and N. Nelson regarding claims objections and other discovery in anticipation of confirmation hearing (.3); correspondence with N. Nelson and B. Ramirez regarding confirmation hearing scheduling and related deadlines (.1); call with counsel for D. White and Romspen regarding discovery in advance of confirmation (.4); review and revise certificate of service regarding solicitation packages and correspondence to B. Ramirez regarding same (.4).	1.90 hrs	420 /hr	798.00
12/07/2020	BR	Finalize certificate of service for solicitation packages; file re same.	1.10 hrs	165 /hr	181.50
12/07/2020	JMR	Correspondence with D. Williamson regarding advancing document production and requests (0.3); search and identify key documents to produce in response to same, including protection of privilege (2.1)	2.40 hrs	560 /hr	1,344.00
12/07/2020	SDL	Correspondence with T. Irion regarding solicitation materials and claim.	0.20 hrs	420 /hr	84.00
12/08/2020	JMR	Strategy conference with G. Milligan and trustee legal team to advance discovery and confirmation hearing preparations (.6); strategy call with S. Lawrence on same (.2); draft response and follow up correspondence with D. Williamson (.5); correspondence with Dentons regarding inquiry on	3.00 hrs	560 /hr	1,680.00

		Page		2	
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP		Invoice No:		131376	
For Professional Services Rendered		Invoice through:		12/31/2020	
	same (.4); strategy and coordination conference with T. Scannell, G. Milligan and N. Nelson to advance confirmation litigation preparations and next steps (1.0); correspondence with creditors on ballots (.3)				
12/08/2020	SDL	Call with Trustee and team regarding confirmation discovery (.4); correspondence with K. Mercer, R. Horton, and T. Scannell regarding ballots (.2); call with counsel for Romspen regarding discovery (.4); review and collate ballots and correspondence with B. Ramirez regarding same (.5).	1.50 hrs	420 /hr	630.00
12/09/2020	JMR	Correspondence with G. Milligan on discovery scheduling and strategy (.2); correspondence with D. Williamson on same (.2)	0.40 hrs	560 /hr	224.00
12/10/2020	JMR	Portion of strategy call with G. Milligan and trustee team to advance confirmation preparations, discovery and related issues (.5); develop discovery work plan regarding White parties objections and in support of settlement and advance same (2.7); correspondence with N.Nelson on same (.4); correspondence with T. Scannell and D. Williamson on same (.3)	3.90 hrs	560 /hr	2,184.00
12/10/2020	SDL	Correspondence with creditor representative regarding voting for plan.	0.20 hrs	420 /hr	84.00
12/15/2020	JMR	Trustee team legal strategy call to advance plan confirmation preparations, voting, brief and declaration and related issues (.4); call with T. Scannell on same (.5); correspondence with D. Williamson and B. Duke (.2); analysis of subpoenas by Romspen to D. White (.2); assess discovery and confirmation preparation plans and related litigation strategy (.8)	2.10 hrs	560 /hr	1,176.00
12/16/2020	BR	Prepare trustee's declaration in support of amended plan.	2.00 hrs	165 /hr	330.00
12/16/2020	JMR	Strategy call with T. Scannell on discovery and litigation plan and developments in advancing confirmation (.5); analysis of documents produced by Romspen (1.4); correspondence with trustee team on same (.3)	2.20 hrs	560 /hr	1,232.00
12/16/2020	SDL	Research forms of declaration for Trustee in support of confirmation (1.4); correspondence with B. Ramirez regarding and revisions to solicitation tracking sheet (.4); correspondence to B. Ramirez regarding draft of Trustee's declaration in support of confirmation (.8); calls and correspondence with claimants regarding balloting (.6).	3.20 hrs	420 /hr	1,344.00
12/17/2020	BR	Continue revising trustee's declaration in support of amended plan.	1.10 hrs	165 /hr	181.50
12/17/2020	JMR	Trustee team call to advance plan confirmation preparations, discovery with D. White, creditor solicitation and related issues (.5); draft follow up discovery correspondence with D. White counsel on same (.5); analysis of settlement proposal from White Parties (.8); telephone conference with T. Scannell on same (.4); correspondence with G. Milligan on same (.3); strategy call with G. Milligan on same (.3); analysis of Rompsen comments to	5.40 hrs	560 /hr	3,024.00

		Page		3	
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP		Invoice No:		131376	
For Professional Services Rendered		Invoice through:		12/31/2020	
		settlement proposal (.4); correspondence with T. Scannell on same (.4); advance D. White discovery and production (.7); analysis of Rompsen production (1.1)			
12/17/2020	SDL	Call with Trustee and team regarding plan, solicitation, discovery for confirmation hearing, settlement of confirmation objections and related issues (.3); calls and correspondence with various claimants regarding voting (1.3); correspondence with N. Nelson regarding debtor's corporate organization (.4); correspondence with B. Ramirez regarding and revisions to G. Milligan declaration in support of confirmation (1.0); review confirmation settlement proposal from White Parties and correspondence to J. Rudd regarding same (.3).	3.30 hrs	420 /hr	1,386.00
12/18/2020	BR	Continue revising declarations.	0.90 hrs	165 /hr	148.50
12/18/2020	JMR	Analysis of Panache and T. Scannell comments and correspondence on White parties settlement proposal (.5); correspondence with A. Zarafshani, K. Mercer and T. Scannell on same (0.5); analysis of Romspen production to White Parties (1.3); review of Romspen ballors and respond on same (.3); strategy analysis to advance resolution of White Parties objection to plan (.6); follow up with S. Lawrence on creditor communications to submit ballots (.3)	3.50 hrs	560 /hr	1,960.00
12/18/2020	SDL	Correspondence with N. Nelson regarding corporate organization of Debtor (.5); continue to draft and revise declaration in support of confirmation (2.5); calls and correspondence with various claimants regarding solicitation of votes in favor of plan (3.4).	6.40 hrs	420 /hr	2,688.00
12/19/2020	SDL	Continue drafting and revisions to Trustee's declaration in support of confirmation (1.0); correspondence regarding and review of Romspen ballots (.2).	1.20 hrs	420 /hr	504.00
12/20/2020	SDL	Drafting and revisions to Trustee's declaration in support of confirmation (2.2); correspondence to J. Rudd regarding solicitation communications status (.1).	2.30 hrs	420 /hr	966.00
12/21/2020	JMR	Strategy conference with T. Scannell on response to White settlement offer and related confirmation issues (.4); correspondence with N. Nelson on same (.4); correspondence with D. Williamson and B. Duke on same (.4); analysis and initial comments to Trustee declaration (1.3); correspndence with S. Lawrence and N. Nelson on same (.3); follow up correspondence with B. Duke (.2); analysis of discovery served by Romspen (.3)	3.30 hrs	560 /hr	1,848.00
12/21/2020	SDL	Continue drafting and revision declaration of Trustee in support of confirmation (2.6); call with J. Rudd regarding same (.2); call with Panache regarding claims and solicitation (.4); correspondence with Trustee regarding solicitation and confirmation (.3).	3.50 hrs	420 /hr	1,470.00
12/22/2020	JMR	Correspondence with B. Duke to advance discovery conference and service of same (.2); strategy call with N. Nelson and S. Lawrence on comments to Milligan declaration, discovery with White parties	5.40 hrs	560 /hr	3,024.00

			Page	4	
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP			Invoice No:	131376	
For Professional Services Rendered			Invoice through:	12/31/2020	
		and related confirmation litigation and preparations issues (.9); portion of strategy conference with G. Milligan and E. White on same, including related voting and hearing preparation strategy and next steps (.9); correspondence with B. Duke on discovery (.3); follow up correspondence with B. Duke and D. Williamson (.3); analysis of claim resolutions on recovery and plan treatment (.5); follow up correspondence on declaration drafting and comments (.6); provide supporting documents to N. Nelson to advance White discovery (.8); analysis and comment on request for produciton (.9)			
12/22/2020	SDL	Call with J. Rudd and N. Nelson regarding revisions to Trustee declaration in support of confirmation (.5); call with Trustee and team regarding confirmation, associated discovery, declaration, and related issues (.5).	1.00 hrs	420 /hr	420.00
12/23/2020	JMR	Outline discovery and settlement issues and review recent correspondence to prepare for conference with White Parties counsel on same (.8); conference with D. Williamson, B. Duke and N. Nelson to advance discovery and settlement resolutions (.6); follow up call with G. Milligan on same (.4); analysis and comment on final discovery requests (.7); correspondence on same (.3); telephone conference with T. Scannell on same (.3)	3.10 hrs	560 /hr	1,736.00
12/26/2020	SDL	Review ballot from and correspondence with Keytech representative.	0.20 hrs	420 /hr	84.00
12/28/2020	JMR	Correspondence with T. Scannell and D. Williamson to advance resolution of plan (.4); correspondence and analysis of ballots from K. Mercer (.4); correspondence with G. Milligan on advancing plan settlement talks (.4)	1.20 hrs	560 /hr	672.00
12/28/2020	SDL	Research and correspondence to Keytech regarding claim and ballot (.4); call with counsel for Wembley metal buildings regarding ballot and next steps (.2); call to Ruiz Testing regarding ballot (.1); correspondence with K. Mercer regarding ballots (.3); emails to L. Norman and M. Beanland regarding ballots (.2); review and revise ballot tabulation (.4); review Trustee declaration and correspondence with Trustee regarding same (.2); review and research response to correspondence from Frontier Plastering (.5).	2.30 hrs	420 /hr	966.00
12/29/2020	JMR	Settlement conference with T. Scannell (.3); call to D. Williamson on same (.1); correspondence on updated settlement term sheet and advancing resolution of items on same (.5); analysis of updated settlement terms (.4); correspondence with G. Milligan with updates on same (.2); analysis of updated balloting information (.3)	1.80 hrs	560 /hr	1,008.00
12/29/2020	SDL	Correspondence related to ballots and solicitation (.4); call with representative of Frontier Plastering regarding plan inquiries (.5).	0.90 hrs	420 /hr	378.00
12/30/2020	JMR	Portion of call with T. Scannell regarding advance plan settlement discussions (.3); correspondence and call to B. Duke and D. Williamson on same (.5);	1.70 hrs	560 /hr	952.00

			Page	5	
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP			Invoice No:	131376	
For Professional Services Rendered			Invoice through:	12/31/2020	
12/30/2020	SDL	correspondence to update trustee on same (.3); analysis of updated ballott analysis (.3); correspondence on same (.3) Correspondence with various parties in interest regarding ballots (.6); correspondence to Trustee and team regarding status of solicitation and balloting (.5); revisions to Trustee's declaration in support of confirmation (1.8).	2.90 hrs	420 /hr	1,218.00
12/31/2020	JMR	Analysis of updated settlement term sheet revisions and related correspondence to advance same (.8); strategy calls (2) with T. Scannell to advance white party settlement and related plan confirmation issues (.6);correspondence with D. Williamson on same (.6); Strategy call with G. Milligan, E. White and Trustee teams to advance creditor voting on plan, settlement of claims and advancing white parties settlement discussions (.7); analysis of updated balloting information and new ballots (.7); correspondence on same (.4); follow up settlement call with T. Scannell (.2); analysis of new settlement term sheet mark up from D. Williamson (.8); correspondence with trustee team on same and related analysis and updates (.5); follow up call with G. Milligan on same (.3); draft correspondence on settlement terms and extension of deadlines to facilitate same (.5); strategy conferences (2) with S. Lawrence on same (.4)	6.50 hrs	560 /hr	3,640.00
12/31/2020	SDL	Correspondence with counsel for Panache concerning ballots (.1); continue revisions to confirmation declaration (1.4); call with Trustee and team regarding status of balloting and solicitation (.7); correspondence and calls to claimants to solicit votes (.7); follow up correspondence to Trustee regarding same, including updates to solicitation tabulation (.2); continue correspondence and calls related to solicitation (1.3); additional updates to tabulation tracker and correspondence to Trustee regarding same (.2).	4.60 hrs	420 /hr	1,932.00
Total fees for this matter			120.60 hrs		54,342.50

DISBURSEMENTS

12/04/2020	Postage. (BR)	700.71
12/04/2020	Copies (BR)	3,598.00
Total disbursements for this matter		\$4,298.71

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 6 Invoice No: 131376 Invoice through: 12/31/2020
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**BILLING SUMMARY**

TOTAL FEES	\$54,342.50
TOTAL DISBURSEMENTS	\$4,298.71
 TOTAL CHARGES FOR THIS BILL	 \$58,641.21
NET BALANCE FORWARD	\$19,367.50
TOTAL BALANCE NOW DUE	\$78,008.71

Timekeeper Summary

Name			Hours	Rate	Amount
Legal Assistant	BR	Brenda Ramirez	17.70	165.00	\$2,920.50
Partner	JMR	Jason M Rudd	58.60	560.00	\$32,816.00
Associate	SDL	Scott D. Lawrence	44.30	420.00	\$18,606.00
			120.60		\$54,342.50

Required Notice to Clients.

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## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200 phone  
(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

January 8, 2021

Invoice No: 131377  
Our File No: 7066-15 JMR  
Billing through: 12/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Financing and Cash Collateral

TOTAL FEES	\$616.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$616.00
NET BALANCE FORWARD	\$814.80
TOTAL BALANCE NOW DUE	<div>\$1,430.80</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

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(214) 692-6255  
Federal Tax No. 45-4183914  
January 8, 2021

Invoice No. 131377  
Reference No. 7066-15 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Financing and Cash Collateral

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
128956	11/06/2020	15	JMR	\$1,106.00	\$221.20
130176	12/03/2020	15	JMR	\$2,968.00	\$593.60
Total Outstanding Balance					\$814.80
Total Amount Due on this Invoice					\$616.00
Total Balance Now Due					\$1,430.80

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$0.00	\$593.60	\$221.20	\$0.00	\$0.00	\$814.80

Please remit payment within 30 days. Thank you!

Wick Phillips Gould & Martin, LLP

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January 8, 2021

Invoice No: 131377  
Our File No: 7066-15 JMR  
Billing through: 12/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

Financing and Cash Collateral

Balance forward as of invoice dated 12/03/2020	\$24,580.60
Payments received since last invoice	\$23,765.80
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$814.80</u>
Trust balance carried forward	\$0.00

FOR PROFESSIONAL SERVICES RENDERED

12/04/2020	JMR	Finalize a challenge extension with T. Scannell and G. Milligan (.5); approval and file same (.3)	0.80 hrs	560 /hr	448.00
12/10/2020	JMR	Analysis of fee budgets in an anticipation of confirmation (.3)	0.30 hrs	560 /hr	168.00
Total fees for this matter			<u>1.10 hrs</u>		<u>616.00</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 1 Invoice No: 131377 Invoice through: 12/31/2020
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**BILLING SUMMARY**

TOTAL FEES	\$616.00
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$616.00
NET BALANCE FORWARD	\$814.80
TOTAL BALANCE NOW DUE	\$1,430.80

**Timekeeper Summary**

Name	Hours	Rate	Amount
Partner JMR Jason M Rudd	1.10	560.00	\$616.00
	1.10		\$616.00

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January 8, 2021

Invoice No: 131378  
Our File No: 7066-03 JMR  
Billing through: 12/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Asset Analysis and Recovery

TOTAL FEES	\$728.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$728.00
NET BALANCE FORWARD	\$624.70
TOTAL BALANCE NOW DUE	<div>\$1,352.70</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP  
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Federal Tax No. 45-4183914

January 8, 2021

Invoice No. 131378  
Reference No. 7066-03 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Asset Analysis and Recovery

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
128948	11/06/2020	03	JMR	\$2,227.50	\$445.50
130173	12/03/2020	03	JMR	\$896.00	\$179.20
Total Outstanding Balance					\$624.70
Total Amount Due on this Invoice					\$728.00
Total Balance Now Due					\$1,352.70

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$0.00	\$179.20	\$445.50	\$0.00	\$0.00	\$624.70

Please remit payment within 30 days. Thank you!

Wick Phillips Gould & Martin, LLP

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Federal Tax ID: 45-4183914

January 8, 2021

Invoice No: 131378  
Our File No: 7066-03 JMR  
Billing through: 12/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

Asset Analysis and Recovery

Balance forward as of invoice dated 12/03/2020	\$7,621.30
Payments received since last invoice	\$6,996.60
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$624.70</u>
Trust balance carried forward	\$0.00

FOR PROFESSIONAL SERVICES RENDERED

12/02/2020	JMR	Conference call with A. Zarafshani and R. Horton regarding A-1/NAE claims recovery (.5); correspondence with G. Milligan on same (.2); call with R. Horton on same (.3); call with N. Nelson to advance prosecution of same with insurance and A-1/NAE counsel (.3)	1.30 hrs	560 /hr	728.00
Total fees for this matter			<u>1.30 hrs</u>		<u>728.00</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP For Professional Services Rendered	Page 1 Invoice No: 131378 Invoice through: 12/31/2020
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BILLING SUMMARY

TOTAL FEES	\$728.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	\$728.00
NET BALANCE FORWARD	\$624.70
TOTAL BALANCE NOW DUE	\$1,352.70

Timekeeper Summary

Name	Hours	Rate	Amount
Partner JMR Jason M Rudd	1.30	560.00	\$728.00
	1.30		\$728.00

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January 8, 2021

Invoice No: 131379  
Our File No: 7066-02 JMR  
Billing through: 12/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: General

TOTAL FEES	\$0.00
TOTAL DISBURSEMENTS	\$1.03
TOTAL CHARGES FOR THIS BILL	<hr/> \$1.03
NET BALANCE FORWARD	\$0.00
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$1.03</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

**Wick Phillips Gould & Martin, LLP**

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January 8, 2021

Invoice No: 131379  
Our File No: 7066-02 JMR  
Billing through: 12/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

**General**

Balance forward as of invoice dated	\$0.00
Payments received since last invoice	\$0.00
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$0.00</u>
Trust balance carried forward	\$0.00

**DISBURSEMENTS**

11/25/2020	Jason Rudd - Filing / Court Fees, 11/25/20, Debtor corporate SOS filing search, Jason Rudd	1.03
Total disbursements for this matter		<u>\$1.03</u>

**BILLING SUMMARY**

TOTAL FEES	\$0.00
TOTAL DISBURSEMENTS	\$1.03
TOTAL CHARGES FOR THIS BILL	\$1.03
NET BALANCE FORWARD	\$0.00
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$1.03</div>

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January 8, 2021

Invoice No: 131380  
Our File No: 7066-01 JMR  
Billing through: 12/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: 3443 Zen Gardens Bankruptcy

TOTAL FEES	\$0.00
TOTAL DISBURSEMENTS	\$172.86
TOTAL CHARGES FOR THIS BILL	<hr/> \$172.86
NET BALANCE FORWARD	\$0.00
TOTAL BALANCE NOW DUE	<div>\$172.86</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

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January 8, 2021

Invoice No: 131380  
Our File No: 7066-01 JMR  
Billing through: 12/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

**3443 Zen Gardens Bankruptcy**

Balance forward as of invoice dated 12/03/2020	\$384.88
Payments received since last invoice	\$384.88
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$0.00</u>
Trust balance carried forward	\$0.00

**DISBURSEMENTS**

11/30/2020	Inventus - November Hosting	172.86
Total disbursements for this matter		<u>\$172.86</u>

**BILLING SUMMARY**

TOTAL FEES	\$0.00
TOTAL DISBURSEMENTS	\$172.86
TOTAL CHARGES FOR THIS BILL	\$172.86
NET BALANCE FORWARD	\$0.00
TOTAL BALANCE NOW DUE	<div>\$172.86</div>

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Federal Tax No: 45-4183914

January 8, 2021

Invoice No: 131381  
Our File No: 7066-13 JMR  
Billing through: 12/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Employment and Fee Applications

TOTAL FEES	\$498.50
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$498.50
NET BALANCE FORWARD	\$4,189.22
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$4,687.72</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP  
Please include invoice number on payment. Thank you!

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Federal Tax No. 45-4183914

January 8, 2021

Invoice No. 131381  
Reference No. 7066-13 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Employment and Fee Applications

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
128946	11/06/2020	13	JMR	\$7,378.00	\$1,475.60
130179	12/03/2020	13	JMR	\$14,498.30	\$2,713.62
Total Outstanding Balance					\$4,189.22
Total Amount Due on this Invoice					\$498.50
Total Balance Now Due					\$4,687.72

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$0.00	\$2,713.62	\$1,475.60	\$0.00	\$0.00	\$4,189.22

Please remit payment within 30 days. Thank you!

Wick Phillips Gould & Martin, LLP

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Dallas, TX 75204  
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(214) 692-6255  
Federal Tax ID: 45-4183914

January 8, 2021

Invoice No: 131381  
Our File No: 7066-13 JMR  
Billing through: 12/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

Employment and Fee Applications

Balance forward as of invoice dated 12/03/2020	\$30,017.14
Payments received since last invoice	\$25,827.92
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$4,189.22</u>
Trust balance carried forward	\$0.00

FOR PROFESSIONAL SERVICES RENDERED

12/04/2020	BR	Prepare certificates of no objections for November fee applications; file re same.	0.90 hrs	165 /hr	148.50
12/04/2020	SDL	Correspondence to B. Ramirez regarding certificates of no objection related to fee applications and review and revise same (.1); correspondence and calls to Court regarding same (.2).	0.30 hrs	420 /hr	126.00
12/07/2020	JMR	Prepare and serve Harney, Trustee and counsel monthly fee statement (.4)	0.40 hrs	560 /hr	224.00
Total fees for this matter			<u>1.60 hrs</u>		<u>498.50</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 1 Invoice No: 131381 Invoice through: 12/31/2020
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**BILLING SUMMARY**

TOTAL FEES	\$498.50
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$498.50
NET BALANCE FORWARD	\$4,189.22
TOTAL BALANCE NOW DUE	\$4,687.72

**Timekeeper Summary**

Name			Hours	Rate	Amount
Legal Assistant	BR	Brenda Ramirez	0.90	165.00	\$148.50
Partner	JMR	Jason M Rudd	0.40	560.00	\$224.00
Associate	SDL	Scott D. Lawrence	0.30	420.00	\$126.00
			1.60		\$498.50

**Required Notice to Clients.**

THE STATE BAR OF TEXAS INVESTIGATES AND PROSECUTES PROFESSIONAL MISCONDUCT COMMITTED BY TEXAS ATTORNEYS. ALTHOUGH NOT EVERY COMPLAINT AGAINST OR DISPUTE WITH A LAWYER INVOLVES PROFESSIONAL MISCONDUCT, THE STATE BAR'S OFFICE OR GENERAL COUNSEL WILL PROVIDE YOU WITH INFORMATION ABOUT HOW TO FILE A COMPLAINT. PLEASE CALL 1-800-932-1900 TOLL-FREE FOR MORE INFORMATION.



## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200 phone  
(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

January 8, 2021

Invoice No: 131647  
Our File No: 7066-16 JMR  
Billing through: 12/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Litigation: Contested Matters and Adversary  
Proceedings

TOTAL FEES	\$2,229.50
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$2,229.50
NET BALANCE FORWARD	\$3,242.00
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$5,471.50</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax No. 45-4183914

January 8, 2021

Invoice No. 131647  
Reference No. 7066-16 JMR

Greg Milligan  
Attn: Gregory S. Milligan

Litigation: Contested Matters and Adversary Proceedings

### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
128958	11/06/2020	16	JMR	\$10,456.00	\$2,091.20
130177	12/03/2020	16	JMR	\$5,754.00	\$1,150.80
Total Outstanding Balance					\$3,242.00
Total Amount Due on this Invoice					\$2,229.50
Total Balance Now Due					\$5,471.50

### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$0.00	\$1,150.80	\$2,091.20	\$0.00	\$0.00	\$3,242.00

Please remit payment within 30 days. Thank you!

**Wick Phillips Gould & Martin, LLP**

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

January 8, 2021

Invoice No: 131647  
Our File No: 7066-16 JMR  
Billing through: 12/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Litigation: Contested Matters and Adversary Proceedings**

Balance forward as of invoice dated 12/03/2020	\$8,271.30
Payments received since last invoice	\$5,029.30
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$3,242.00</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

12/02/2020	JMR	Appear for docket call in Panache adversary (0.4)	0.40 hrs	560 /hr	224.00
12/04/2020	JMR	Portion of Trustee team conference on advancing A-1 and NAE claims and related issues (.4); strategy conference with N. Nelson on same (.3); correspondence with R. Horton on same (.2)	0.90 hrs	560 /hr	504.00
12/04/2020	NBN	Prepare for and attend call with counsel for White Parties regarding production of documents and other items; correspond with counsel for White Parties; review order regarding turnover of documents.	1.30 hrs	495 /hr	643.50
12/08/2020	NBN	Prepare for and attend call with client; correspond with J. Henry regarding A-1 Engineering claim; review documents produced by third parties; coordinate production of documents produced by third parties.	0.00 hrs	495 /hr	N/C
12/15/2020	NBN	Prepare for and attend call with Trustee; correspond with counsel for A-1 Engineering and North American.	0.80 hrs	495 /hr	396.00
12/23/2020	SDL	Call with J. Rudd, N. Nelson and White Parties counsel regarding discovery and confirmation objections (.5); review and revise request for production to White Parties (.2).	0.70 hrs	420 /hr	294.00
12/24/2020	SDL	Review and revise discovery requests to D. White (.2); call and correspondence with N. Nelson and counsel for D. White regarding same (.2).	0.40 hrs	420 /hr	168.00
Total fees for this matter			<u>4.50 hrs</u>		<u>2,229.50</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP For Professional Services Rendered	Page 1 Invoice No: 131647 Invoice through: 12/31/2020
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BILLING SUMMARY

TOTAL FEES	\$2,229.50
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	\$2,229.50
NET BALANCE FORWARD	\$3,242.00
TOTAL BALANCE NOW DUE	\$5,471.50

Timekeeper Summary

Name			Hours	Rate	Amount
Partner	JMR	Jason M Rudd	1.30	560.00	\$728.00
Partner	NBN	Nick B. Nelson	0.00	0.00	\$0.00
Partner	NBN	Nick B. Nelson	2.10	495.00	\$1,039.50
Associate	SDL	Scott D. Lawrence	1.10	420.00	\$462.00
			4.50		\$2,229.50

Required Notice to Clients.

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(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

January 8, 2021

Invoice No: 131690  
Our File No: 7066-10 JMR  
Billing through: 12/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Claims Administration and Objections

TOTAL FEES	\$29,303.00
TOTAL DISBURSEMENTS	\$147.44
TOTAL CHARGES FOR THIS BILL	<hr/> \$29,450.44
NET BALANCE FORWARD	\$5,959.10
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$35,409.54</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP  
Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
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(214) 692-6200  
(214) 692-6255  
Federal Tax No. 45-4183914

January 8, 2021

Invoice No. 131690  
Reference No. 7066-10 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Claims Administration and Objections

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
128953	11/06/2020	10	JMR	\$168.00	\$33.60
130175	12/03/2020	10	JMR	\$29,627.50	\$5,925.50
Total Outstanding Balance					\$5,959.10
Total Amount Due on this Invoice					\$29,450.44
Total Balance Now Due					\$35,409.54

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$0.00	\$5,925.50	\$33.60	\$0.00	\$0.00	\$5,959.10

Please remit payment within 30 days. Thank you!

**Wick Phillips Gould & Martin, LLP**

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Federal Tax ID: 45-4183914

January 8, 2021

Invoice No: 131690  
Our File No: 7066-10 JMR  
Billing through: 12/31/2020

Greg Milligan  
Attn: Gregory S. Milligan

**Claims Administration and Objections**

Balance forward as of invoice dated 12/03/2020	\$30,909.20
Payments received since last invoice	\$24,950.10
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$5,959.10</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

12/03/2020	JMR	Analysis of new correspondence and information from Trane (.3); draft response to same (.4); strategy conference with S. Lawrence on advancing claim resolution and objections (.3)	1.00 hrs	560 /hr	560.00
12/03/2020	NBN	Review invoices produced by Hinshaw; provide summary of comments to J. Rudd.	2.10 hrs	495 /hr	1,039.50
12/04/2020	JMR	Portion of trustee team call to address claims objections and analysis, including resolution of secured claims (.3); correspondence with claimants on same (.3)	0.60 hrs	560 /hr	336.00
12/04/2020	NBN	Prepare for and attend strategy call with client on review of Hinshaw invoices.	1.50 hrs	495 /hr	742.50
12/07/2020	JMR	Analysis and approve motion to allow Scheduled C/U/D claims (.6); correspondence on same (.2)	0.80 hrs	560 /hr	448.00
12/07/2020	NBN	Correspond with opposing counsel regarding stipulation on production of Hinshaw documents; review existing turnover order.	0.40 hrs	495 /hr	198.00
12/07/2020	SDL	Initial draft of motion to allow contingent claims (2.0); correspondence to Trustee regarding same (.1).	2.10 hrs	420 /hr	882.00
12/08/2020	BR	Finalize motion to allow contingent claims; file and serve re same.	1.00 hrs	165 /hr	165.00
12/08/2020	JMR	Portion of trustee team call regarding advancing negotiations and resolution of secured claims (.4)	0.40 hrs	560 /hr	224.00
12/08/2020	NBN	Correspond with Jeff Henry regarding prior settlement discussions with A-1 Engineering and North American; prepare for and attend call related to same; prepare for and attend call related to	2.50 hrs	495 /hr	1,237.50

		Page		1	
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP		Invoice No:		131690	
For Professional Services Rendered		Invoice through:		12/31/2020	
	document production and strategy for pursuing claims against A-1 and North American; review documents related to A-1 claims; review documents related to Dan White criminal history and correspond with team regarding production of same.				
12/08/2020	SDL	Call with Trustee and team regarding claims objections (.2); revisions to draft stipulation with Schindler (2.2); finalize motion to allow contingent claims and correspondence with B. Ramirez regarding same (.2); correspondence and call with E. White regarding Wembley claim (.3).	2.90 hrs	420 /hr	1,218.00
12/09/2020	JMR	Review and revise draft Schindler secured claim stipulation (.8); correspondence with G. Milligan on same (.3); correspondence with Trane counsel (.3)	1.40 hrs	560 /hr	784.00
12/09/2020	NBN	Prepare for and attend call with client; coordinate delivery of documents to e-discovery vendor; review documents prior to production; review draft stipulation prepared by counsel for White Parties; revise stipulation and correspond with J. Rudd regarding same.	2.70 hrs	495 /hr	1,336.50
12/09/2020	SDL	Call and correspondence with J. Rudd regarding Schindler stipulation (.1); correspondence with Trustee and team regarding H&H settlement offer (.1).	0.20 hrs	420 /hr	84.00
12/10/2020	BR	Finalize Wembley claim objection; file and serve re same.	1.20 hrs	165 /hr	198.00
12/10/2020	JMR	Conference with K. Mercer regarding claim treatment issues (.2); correspondence regarding Schindler, Trane and other secured claims (1.2); portion of conference call with G. Milligan on same (.4); analysis of Wimbely claim to advance objection on same (.3); correspondence with S. Lawrence on same (.2)	2.30 hrs	560 /hr	1,288.00
12/10/2020	NBN	Correspond with carrier representative for North American; correspond with counsel for White Parties regarding stipulation involving document production.	0.70 hrs	495 /hr	346.50
12/10/2020	SDL	Revisions to objection to Wembley claim and correspondence to and call with Trustee and team regarding same (.5); call with Trustee and team regarding other claims matters and next steps regarding same (.4); finalize Wembley claim objection for filing (.3).	1.20 hrs	420 /hr	504.00
12/14/2020	JMR	Correspondence with A. Zarafshani and K. Mercer regarding addressing secured claims and related issues (.2)	0.20 hrs	560 /hr	112.00
12/14/2020	SDL	Correspondence to E. White regarding H&H claim.	0.10 hrs	420 /hr	42.00
12/15/2020	JMR	Coordinate strategy on communications with creditors to advance plan approval (.4); correspondence with creditors on same (.2)	0.60 hrs	560 /hr	336.00
12/16/2020	JMR	Correspondence with S. Lawrence on coordinating follow up with Class 6 creditors (.2); correspondence with K. Mercer on secured claim issues (.2)	0.40 hrs	560 /hr	224.00
12/16/2020	NBN	Coordinate delivery of Romspen documents to e-discovery vendor; review documents.	0.80 hrs	495 /hr	396.00



			Page		2
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP			Invoice No:		131690
For Professional Services Rendered			Invoice through:		12/31/2020
12/17/2020	JMR	Revise stipulation on secured claim objection resolution (.4); strategy conference with K. Mercer regarding Schindler, Trane and other claim objections and resolutions (.4); correspondence on Symmetry claim allowance terms of proposed White deal (0.4)	1.20 hrs	560 /hr	672.00
12/17/2020	NBN	Prepare for and attend call with counsel for A-1 Engineering; correspond with client regarding same; gather information requested by opposing counsel; review organizational charts and other documents to respond to requests from opposing counsel; correspond with e-discovery vendor regarding preparation of documents for production; prepare for and attend call with counsel for North American Contractors.	2.70 hrs	495 /hr	1,336.50
12/17/2020	SDL	Call with Trustee and team regarding claims objections and resolutions of same (.3); revisions to proposed stipulation with H&H Crane and correspondence to J. Rudd regarding same (.6); call with representative of Great Lakes Lifting regarding potential claim and review of correspondence regarding same (.5).	1.40 hrs	420 /hr	588.00
12/18/2020	JMR	Analysis of S. Lawrence memo on GL Lifting, Wimbley, and other Class 9 claims and related responses to communications from same (.4); correspondence with G. Milligan regarding Schindler/Trane and other claim resolution strategy points (.3); analysis of same with S. Lawrence (.3); analysis of ballot tabulation status summary and correspondence on same (.3)	1.30 hrs	560 /hr	728.00
12/18/2020	SDL	Correspondences with J. Rudd and claimant's counsel regarding and revisions to proposed stipulation with H&H (.3); correspondence with J. Rudd regarding Great Lakes Lifting claim (.2).	0.50 hrs	420 /hr	210.00
12/21/2020	NBN	Review and revise declaration in support of plan confirmation; review prior correspondence with White Parties and their counsel.	1.50 hrs	495 /hr	742.50
12/22/2020	JMR	Portion of strategy call with N.Nelson and S. Lawrence on secured and unsecured claim allowance, objections and related issue assessment and strategy (.3); correspondence on same (.4); portion of trustee team call regarding secured claims objections, stipulations and related strategy and next steps (.3); comments on secured claim stipulations (.5) conference call with M. Carter regarding Hinshaw claims (.5); analysis of issues on same (.8); claim administration strategy call with G. Milligan, N. Nelson and S. Lawrence regarding strategy on Hinshaw claim and pending secured claims (.6); correspondence with A. Zarafshani on claim settlements (.2); follow up call with G. Milligan on same (.2); call and correspondence with K. Mercer (.1); follow up correspondence with G. Milligan on same (.2); strategy on addressing potential distributions outside of plan (.5)	4.70 hrs	560 /hr	2,632.00
12/22/2020	NBN	Attend strategy call; review Hinshaw invoices; correspond with S. Lawrence regarding same.	0.70 hrs	495 /hr	346.50

				Page	3
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP				Invoice No:	131690
For Professional Services Rendered				Invoice through:	12/31/2020
12/22/2020	NBN	Prepare subpoena for documents and deposition notice for White Parties; correspond with team regarding same.	2.30 hrs	495 /hr	1,138.50
12/22/2020	SDL	Call with J. Rudd and N. Nelson regarding Hinshaw claim (.3); call with Trustee and Team regarding same (.2); research and draft memorandum regarding applicable law on attorney liens (3.3); follow up call with Trustee and team regarding next steps on Hinshaw claim (.5); draft and revise stipulation regarding Hinshaw claim (.6).	4.90 hrs	420 /hr	2,058.00
12/23/2020	SDL	Correspondence with J. Rudd regarding Hinshaw stipulation (.1); review settlement agreements related to Schindler contract (.3).	0.40 hrs	420 /hr	168.00
12/28/2020	JMR	Extensive revisions to Hinshaw stipulation resolving claim allowance and Class 6 treatment (1.2); conference call with M. Carter on same (.4); extensive correspondence with M. Carter on same (.7)	2.30 hrs	560 /hr	1,288.00
12/28/2020	NBN	Review and revise declaration in support of plan confirmation; correspond with S. Lawrence regarding same.	2.10 hrs	495 /hr	1,039.50
12/29/2020	JMR	Extensive telephone conference with M. Carter at Hinshaw to advance settlement of claim and related issues (.5); conference call with G. Milligan on update on same (.2); correspondence on Schindler and Trane settlements and related issues (.4); conference call with K. Mercer on same (.2)	1.30 hrs	560 /hr	728.00
12/30/2020	JMR	Correspondence regarding Schindler and Trane claim resolutions (.5); correspondence with A. Zarafshani regarding same and related questions and issues (.4); analysis of Schindler term sheet and comment on same (.3); follow up correspondence on Hinshaw claim resolution (.3)	1.50 hrs	560 /hr	840.00
12/30/2020	SDL	Research and draft stipulation for agreed withdrawal of Schindler claim (.3); correspondence with J. Rudd regarding same (.1).	0.40 hrs	420 /hr	168.00
12/31/2020	JMR	Strategy conference with A. Zarafshani, Trustee and counsel regarding settlement and resolution of claims (.5); follow up correspondence and analysis of agreements on same (.4); telephone conference with Hinshaw regarding settlement of claim as unsecured Class 6 claim (.4); correspondence regarding Hinshaw claim allowance stipulation (.4); review and approve objection to Hinshaw claims (.4); call with G. Milligan on same (.2); call with S. Lawrence on same (.3)	2.60 hrs	560 /hr	1,456.00
12/31/2020	SDL	Call with J. Rudd regarding objection to Hinshaw claim (.1); revise and finalize same (1.0).	1.10 hrs	420 /hr	462.00
Total fees for this matter			60.00 hrs		29,303.00

DISBURSEMENTS

12/08/2020	Postage. (BR)	30.00
12/08/2020	Copies (BR)	84.00

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered		Page	4
		Invoice No:	131690
		Invoice through:	12/31/2020
12/31/2020	Thomson Reuters-West - Online Research		33.44
Total disbursements for this matter			<u>\$147.44</u>

BILLING SUMMARY

TOTAL FEES	\$29,303.00
TOTAL DISBURSEMENTS	\$147.44
TOTAL CHARGES FOR THIS BILL	\$29,450.44
NET BALANCE FORWARD	\$5,959.10
TOTAL BALANCE NOW DUE	<span style="border: 1px solid black;">\$35,409.54</span>

Timekeeper Summary

Name			Hours	Rate	Amount
Legal Assistant	BR	Brenda Ramirez	2.20	165.00	\$363.00
Partner	JMR	Jason M Rudd	22.60	560.00	\$12,656.00
Partner	NBN	Nick B. Nelson	20.00	495.00	\$9,900.00
Associate	SDL	Scott D. Lawrence	15.20	420.00	\$6,384.00
			60.00		<u>\$29,303.00</u>

Required Notice to Clients.

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(214) 692-6200 phone  
(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

February 3, 2021

Invoice No: 132667  
Our File No: 7066-01 JMR  
Billing through: 01/31/2021

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: 3443 Zen Gardens Bankruptcy

TOTAL FEES	\$0.00
TOTAL DISBURSEMENTS	\$1,074.18
TOTAL CHARGES FOR THIS BILL	<hr/> \$1,074.18
NET BALANCE FORWARD	\$0.00
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$1,074.18</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

**Wick Phillips Gould & Martin, LLP**

3131 McKinney Avenue  
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(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

February 3, 2021

Invoice No: 132667  
Our File No: 7066-01 JMR  
Billing through: 01/31/2021

Greg Milligan  
Attn: Gregory S. Milligan

3443 Zen Gardens Bankruptcy

Balance forward as of invoice dated 01/08/2021	\$172.86
Payments received since last invoice	\$172.86
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$0.00</u>
Trust balance carried forward	\$0.00

DISBURSEMENTS

01/01/2021	Inventus - Hosting & Project Consulting	1,074.18
	Total disbursements for this matter	<u>\$1,074.18</u>

BILLING SUMMARY

TOTAL FEES	\$0.00
TOTAL DISBURSEMENTS	\$1,074.18
TOTAL CHARGES FOR THIS BILL	\$1,074.18
NET BALANCE FORWARD	\$0.00
TOTAL BALANCE NOW DUE	<div>\$1,074.18</div>

Required Notice to Clients.

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## Wick Phillips Gould & Martin, LLP

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(214) 692-6200 phone  
(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

February 3, 2021

Invoice No: 132668  
Our File No: 7066-13 JMR  
Billing through: 01/31/2021

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Employment and Fee Applications

TOTAL FEES	\$981.50
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$981.50
NET BALANCE FORWARD	\$4,288.92
TOTAL BALANCE NOW DUE	<div>\$5,270.42</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
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(214) 692-6200  
(214) 692-6255  
Federal Tax No. 45-4183914

February 3, 2021

Invoice No. 132668  
Reference No. 7066-13 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Employment and Fee Applications

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
128946	11/06/2020	13	JMR	\$7,378.00	\$1,475.60
130179	12/03/2020	13	JMR	\$14,498.30	\$2,713.62
131381	01/08/2021	13	JMR	\$498.50	\$99.70
Total Outstanding Balance					\$4,288.92
Total Amount Due on this Invoice					\$981.50
Total Balance Now Due					<u>\$5,270.42</u>

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$99.70	\$0.00	\$4,189.22	\$0.00	\$0.00	\$4,288.92

Please remit payment within 30 days. Thank you!

Wick Phillips Gould & Martin, LLP

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(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

February 3, 2021

Invoice No: 132668  
Our File No: 7066-13 JMR  
Billing through: 01/31/2021

Greg Milligan  
Attn: Gregory S. Milligan

Employment and Fee Applications

Balance forward as of invoice dated 01/08/2021	\$4,687.72
Payments received since last invoice	\$398.80
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$4,288.92</u>
Trust balance carried forward	\$0.00

FOR PROFESSIONAL SERVICES RENDERED

01/05/2021	SDL	Correspondence to B. Ramirez regarding notices of fee increases.	0.10 hrs	450 /hr	45.00
01/06/2021	BR	Prepare notice of rate increase.	0.20 hrs	175 /hr	35.00
01/09/2021	JMR	Prepare, draft and serve monthly fee statement for all Trustee and all professionals (.8); correspondence with Trustee on same (.2)	1.00 hrs	615 /hr	615.00
01/13/2021	SDL	Revise and finalize notice of rate changes (.4); correspondences with Trustee and B. Ramirez regarding same (.1).	0.50 hrs	450 /hr	225.00
01/22/2021	JMR	Correspondence on fee procedures (.1)	0.10 hrs	615 /hr	61.50
		Total fees for this matter	1.90 hrs		<u>981.50</u>



Greg Milligan as proposed ch 11 trustee of  
3443 Zen Garden LP  
For Professional Services Rendered

Page 1  
Invoice No: 132668  
Invoice through: 01/31/2021

**BILLING SUMMARY**

TOTAL FEES	\$981.50
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$981.50
NET BALANCE FORWARD	\$4,288.92
TOTAL BALANCE NOW DUE	\$5,270.42

**Timekeeper Summary**

Name			Hours	Rate	Amount
Legal Assistant	BR	Brenda Ramirez	0.20	175.00	\$35.00
Partner	JMR	Jason M Rudd	1.10	615.00	\$676.50
Associate	SDL	Scott D. Lawrence	0.60	450.00	\$270.00
			1.90		\$981.50

**Required Notice to Clients.**

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## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200 phone  
(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

February 3, 2021

Invoice No: 132670  
Our File No: 7066-20 JMR  
Billing through: 01/31/2021

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Real Estate

TOTAL FEES	\$307.50
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$307.50
NET BALANCE FORWARD	\$100.80
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$408.30</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

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(214) 692-6255  
Federal Tax No. 45-4183914

February 3, 2021

Invoice No. 132670  
Reference No. 7066-20 JMR

Greg Milligan  
Attn: Gregory S. Milligan

Real Estate

### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
130181	12/03/2020	20	JMR	\$504.00	\$100.80
Total Outstanding Balance					\$100.80
Total Amount Due on this Invoice					\$307.50
Total Balance Now Due					<u>\$408.30</u>

### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$0.00	\$0.00	\$100.80	\$0.00	\$0.00	\$100.80

Please remit payment within 30 days. Thank you!

Wick Phillips Gould & Martin, LLP

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(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

February 3, 2021

Invoice No: 132670  
Our File No: 7066-20 JMR  
Billing through: 01/31/2021

Greg Milligan  
Attn: Gregory S. Milligan

Real Estate

Balance forward as of invoice dated 12/03/2020	\$1,232.00
Payments received since last invoice	\$1,131.20
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$100.80</u>
Trust balance carried forward	\$0.00

FOR PROFESSIONAL SERVICES RENDERED

01/20/2021	JMR	Correspondence with Rompsen counsel regarding ad valorem tax payments for 2020 and compliance with sale order on same (.2); review sale order on same to inform discussion (.3)	0.50 hrs	615 /hr	307.50
Total fees for this matter			<u>0.50 hrs</u>		<u>307.50</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 1 Invoice No: 132670 Invoice through: 01/31/2021
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BILLING SUMMARY

TOTAL FEES	\$307.50
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	\$307.50
NET BALANCE FORWARD	\$100.80
TOTAL BALANCE NOW DUE	\$408.30

Timekeeper Summary

Name	Hours	Rate	Amount
Partner JMR Jason M Rudd	0.50	615.00	\$307.50
	0.50		\$307.50

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February 3, 2021

Invoice No: 132671  
Our File No: 7066-03 JMR  
Billing through: 01/31/2021

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Asset Analysis and Recovery

TOTAL FEES	\$9,396.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$9,396.00
NET BALANCE FORWARD	\$770.30
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$10,166.30</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP  
Please include invoice number on payment. Thank you!

Wick Phillips Gould & Martin, LLP

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Federal Tax No. 45-4183914

February 3, 2021

Invoice No. 132671  
Reference No. 7066-03 JMR

Greg Milligan  
Attn: Gregory S. Milligan

Asset Analysis and Recovery

Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
128948	11/06/2020	03	JMR	\$2,227.50	\$445.50
130173	12/03/2020	03	JMR	\$896.00	\$179.20
131378	01/08/2021	03	JMR	\$728.00	\$145.60
Total Outstanding Balance					\$770.30
Total Amount Due on this Invoice					\$9,396.00
Total Balance Now Due					<u>\$10,166.30</u>

Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$145.60	\$0.00	\$624.70	\$0.00	\$0.00	\$770.30

Please remit payment within 30 days. Thank you!

Wick Phillips Gould & Martin, LLP

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Federal Tax ID: 45-4183914

February 3, 2021

Invoice No: 132671  
Our File No: 7066-03 JMR  
Billing through: 01/31/2021

Greg Milligan  
Attn: Gregory S. Milligan

Asset Analysis and Recovery

Balance forward as of invoice dated 01/08/2021	\$1,352.70
Payments received since last invoice	\$582.40
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$770.30</u>
Trust balance carried forward	\$0.00

FOR PROFESSIONAL SERVICES RENDERED

01/06/2021	NBN	Review documents provided by A. Zarafshani; correspond with counsel for insurance carrier of A-1 Engineering; review organizational chart and background; review email correspondence produced by A. Zarafshani and Panache.	1.80 hrs	515 /hr	927.00
01/12/2021	JMR	Correspondence with N. Nelson and K. Mercer on A-1 Claims (.3); portion of trustee team call on same (.2)	0.50 hrs	615 /hr	307.50
01/12/2021	NBN	Attend client call; prepare response email to counsel for Panache regarding acquisition of claims; correspond with Kell Mercer regarding same.	0.80 hrs	515 /hr	412.00
01/12/2021	SDL	Call and correspondence with Trustee, N. Nelson, and J. Rudd regarding A-1 negotiations.	0.20 hrs	450 /hr	90.00
01/14/2021	JMR	Portion of trustee team call on A-1 Claim investigation and recovery (.2); coordinate with N. Nelson on next steps on same (.2)	0.40 hrs	615 /hr	246.00
01/15/2021	JMR	Correspondence with K. Mercer and G. Milligan on A-1 claim	0.10 hrs	615 /hr	61.50
01/18/2021	JMR	Analysis of A1/NAE related reports and correspondence to prepare for conference on same (.4); Correspondence with Strategy and settlement conference with K. Mercer and A. Zarafshani regarding A1/NAE claims (.7); follow up correspondence with G. Milligan and K. Mercer (.2)	1.30 hrs	615 /hr	799.50
01/18/2021	NBN	Prepare for and attend call with A. Zarafshani and counsel.	0.80 hrs	515 /hr	412.00
01/19/2021	JMR	Correspondence with K. Mercer and R. Horton regarding A1/NAE claim issues (.3); analysis of new	0.60 hrs	615 /hr	369.00



			Page		1
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP			Invoice No:		132671
For Professional Services Rendered			Invoice through:		01/31/2021
		documents on same (.3)			
01/20/2021	JMR	Outline offer and related claims dynamic to inform discussion with K. Mercer on A1/NAE claim disposition (.3); Settlement conference with K. Mercer to advance potential sale of A1 NAE claims (.3); correspondence with Trustee team on same (.2); portion of trustee team call on same (.3)	1.10 hrs	615 /hr	676.50
01/22/2021	JMR	Anlaysis of A-1/NAE issues to advance monitization of same in advance (.4); correspondence on same with G. Milligan (.2)	0.60 hrs	615 /hr	369.00
01/22/2021	NBN	Review Hinshaw production to evaluate Hinshaw proposal to return / destroy documents.	2.50 hrs	515 /hr	1,287.50
01/24/2021	JMR	Correspondence with Trustee on update and next steps in advancing resolution of the A1/NAE claim (.2); anlaysis of issues to addressw with R. Horton and K. Mercer on same (.4)	0.60 hrs	615 /hr	369.00
01/25/2021	JMR	Settlement conference with R. Horton regarding advancing resolution of the A1/NAE claim disposition (0.3); correspondence with K. Mercer on same (.2); portion of trustee team call on same (.2); follow up settlement conference with K. Mercer and R. Horton (.3); correspondence with Trustee updating on terms of same same (.3)	1.30 hrs	615 /hr	799.50
01/25/2021	NBN	Prepare for and attend call with client; prepare for and attend call with opposing counsel.	0.80 hrs	515 /hr	412.00
01/25/2021	NBN	Review correspondence from client; correspond with client regarding settlement structure for assignment of certain claims to Panache.	0.30 hrs	515 /hr	154.50
01/26/2021	JMR	Call with R. Horton regarding follow up on A1/NAE claim resolution (.2); portion of trustee team strategy call on same (.3); settlement conference with K. Mercer, R. Horton, G. Milligan regarding negotiation (.4); conference with G. Milligan on same (.3); conference with S. Lawrence on next steps to draft agreement (.2)	1.40 hrs	615 /hr	861.00
01/29/2021	JMR	Assessment of A1/NAE claim resolution with Panache structure and analysis of same (.4); correspondence on same with G. Milligan and S. Lawrence (.3)	0.70 hrs	615 /hr	430.50
01/31/2021	NBN	Review proposed settlement agreement and assignment language; propose alternate language for description of claims.	0.80 hrs	515 /hr	412.00
Total fees for this matter			16.60 hrs		9,396.00

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 2 Invoice No: 132671 Invoice through: 01/31/2021
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**BILLING SUMMARY**

TOTAL FEES	\$9,396.00
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$9,396.00
NET BALANCE FORWARD	\$770.30
TOTAL BALANCE NOW DUE	\$10,166.30

Timekeeper Summary

Name			Hours	Rate	Amount
Partner	JMR	Jason M Rudd	8.60	615.00	\$5,289.00
Partner	NBN	Nick B. Nelson	7.80	515.00	\$4,017.00
Associate	SDL	Scott D. Lawrence	0.20	450.00	\$90.00
			16.60		\$9,396.00

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(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

February 3, 2021

Invoice No: 132672  
Our File No: 7066-04 JMR  
Billing through: 01/31/2021

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Asset Disposition

TOTAL FEES	\$3,240.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$3,240.00
NET BALANCE FORWARD	\$4,593.90
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$7,833.90</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

Wick Phillips Gould & Martin, LLP

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Federal Tax No. 45-4183914

February 3, 2021

Invoice No. 132672  
Reference No. 7066-04 JMR

Greg Milligan  
Attn: Gregory S. Milligan

Asset Disposition

Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
128949	11/06/2020	04	JMR	\$22,521.50	\$4,504.30
130174	12/03/2020	04	JMR	\$448.00	\$89.60
Total Outstanding Balance					\$4,593.90
Total Amount Due on this Invoice					\$3,240.00
Total Balance Now Due					\$7,833.90

Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$0.00	\$0.00	\$4,593.90	\$0.00	\$0.00	\$4,593.90

Please remit payment within 30 days. Thank you!

**Wick Phillips Gould & Martin, LLP**

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Dallas, TX 75204  
(214) 692-6200  
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Federal Tax ID: 45-4183914

February 3, 2021

Invoice No: 132672  
Our File No: 7066-04 JMR  
Billing through: 01/31/2021

Greg Milligan  
Attn: Gregory S. Milligan

**Asset Disposition**

Balance forward as of invoice dated 12/03/2020	\$22,179.00
Payments received since last invoice	\$17,585.10
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$4,593.90</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

01/28/2021	SDL	Review proposed claims release agreement drafted by Panache counsel (.2); begin researching forms of assignment agreement (.7).	0.90 hrs	450 /hr	405.00
01/29/2021	SDL	Call with Trustee and team regarding assignment agreemtn (.3); review form of assignment agreement from J. Rudd (.3); draft and revise assignment agreement, assignment, release agreement, and claims exhibit (3.7); research and revise claims description in schedule of assigned claims attached to assignment (.6).	4.90 hrs	450 /hr	2,205.00
01/30/2021	SDL	Additional revisions to assignment agreement, assignment, releases, assigned claims schedule, and estimated claims schedule (.7); review correspondence from Trustee regarding same and incorporate additional revisions to address concerns raised therein (.4); correspondence to J. Rudd and N. Nelson regarding same (.3).	1.40 hrs	450 /hr	630.00
Total fees for this matter			<u>7.20 hrs</u>		<u>3,240.00</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP For Professional Services Rendered	Page 1 Invoice No: 132672 Invoice through: 01/31/2021
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**BILLING SUMMARY**

TOTAL FEES	\$3,240.00
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$3,240.00
NET BALANCE FORWARD	\$4,593.90
TOTAL BALANCE NOW DUE	\$7,833.90

**Timekeeper Summary**

Name		Hours	Rate	Amount
Associate	SDL	Scott D. Lawrence		
		7.20	450.00	\$3,240.00
		7.20		\$3,240.00

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Federal Tax No: 45-4183914

February 3, 2021

Invoice No: 132673  
Our File No: 7066-19 JMR  
Billing through: 01/31/2021

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Plan and Disclosure Statement

TOTAL FEES	\$86,338.50
TOTAL DISBURSEMENTS	\$1,131.94
TOTAL CHARGES FOR THIS BILL	<hr/> \$87,470.44
NET BALANCE FORWARD	\$30,236.00
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$117,706.44</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

Wick Phillips Gould & Martin, LLP

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Federal Tax No. 45-4183914

February 3, 2021

Invoice No. 132673  
Reference No. 7066-19 JMR

Greg Milligan  
Attn: Gregory S. Milligan

Plan and Disclosure Statement

Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
128954	11/06/2020	19	JMR	\$59,864.00	\$11,972.80
130180	12/03/2020	19	JMR	\$36,973.50	\$7,394.70
131376	01/08/2021	19	JMR	\$58,641.21	\$10,868.50
Total Outstanding Balance					\$30,236.00
Total Amount Due on this Invoice					\$87,470.44
Total Balance Now Due					<u>\$117,706.44</u>

Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$10,868.50	\$0.00	\$19,367.50	\$0.00	\$0.00	\$30,236.00

Please remit payment within 30 days. Thank you!



**Wick Phillips Gould & Martin, LLP**

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Federal Tax ID: 45-4183914

February 3, 2021

Invoice No: 132673  
Our File No: 7066-19 JMR  
Billing through: 01/31/2021

Greg Milligan  
Attn: Gregory S. Milligan

**Plan and Disclosure Statement**

Balance forward as of invoice dated 01/08/2021	\$78,008.71
Payments received since last invoice	\$47,772.71
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$30,236.00</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

01/04/2021	JMR	Correspondence with D. Williamson, T. Scannell regarding advancing White settlement negotiations and documentation of same (.5); settlement conference with D. Williamson and T. Scannell on same (.4); correspondence with G. Milligan on same (.3); follow call with G. Milligan on developments on White settlement (.2); analysis of terms, impact on Panache related issues and plan for means to present same to court and address timely in advance of confirmation (.4); supplement comments and potential inserts for Milligan declaration (1.1)	2.90 hrs	615 /hr	1,783.50
01/04/2021	SDL	Continue revisions to Trustee's confirmation declaration (1.2); review of ballots and correspondence related thereto, confirmation of ballot tally and correspondence to Trustee regarding same (.5); correspondence related to and call with counsel for White Parties regarding confirmation objection stipulation (.6); begin draft of stipulation resolving White Parties confirmation objections (.5).	2.80 hrs	450 /hr	1,260.00
01/05/2021	BR	Revise confirmation order.	1.60 hrs	175 /hr	280.00
01/05/2021	JMR	Extensive revisions to draft stipulation advancing settlement with White Parties (1.9); correspondence with G. Milligan and trustee team on same (.3); correspondence with D. Williamson, B. Duke and T. Scannell on same (.4); correspondence on ballots and related confirmation time line compliance (.3)	2.90 hrs	615 /hr	1,783.50
01/05/2021	SDL	Complete first draft of White Parties Stipulation (1.4); continue follow up regarding Hinshaw ballot, other ballots, and finalizing tally (.4); additional	2.60 hrs	450 /hr	1,170.00

		Page		1	
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP		Invoice No:		132673	
For Professional Services Rendered		Invoice through:		01/31/2021	
	revisions to Trustee declaration in support of confirmation (.8).				
01/06/2021	BR	Finalize stipulation and order re amended plan treatment for Daniel White, Lincoln 1861, Inc. And related entities; file re same.	0.20 hrs	175 /hr	35.00
01/06/2021	JMR	Follow up correspondence with T. Scannell and D. Williamson on draft settlement stipulation (.4); strategy conference with G. Milligan and Trustee team on confirmation settlement discussions with White Parties and related confirmation preparations and developments (.6); correspondence with B. Duke on discovery issues (.3); analysis of issues on status and next steps on discovery (.4); review confirmation and balloting timeline and deadlines and advance planning for compliance with same in view of potential settlement (.6); analysis of T. Scannell comments to settlement stipulation (.3); extensive correspondence with B. Duke, D. Williamson, T. Scannell on settlement documents (.9); settlement conference with D. Williamson, T. Scannell and G. Milligan on final approval and discussions of same (.5); final revisions to settlement stipulation (.6); final correspondence on approval of same (.4); finalize and file (.3); coordinate preparation of motion to expedite (.3); correspondence with K. Mercer on expedited consideration of stipulation (.2); correspondence with S. Tobin on same (.2); strategy call with S. Lawrence regarding confirmation order, declarations and related preparations (.4)	6.40 hrs	615 /hr	3,936.00
01/06/2021	SDL	Call with Trustee and team regarding confirmation hearing preparation and related matters (.7); correspondences with counsel for Lender regarding balloting status (.1); research Court procedure for submitting stipulations for Court signature (.4); correspondence with J. Rudd regarding same (.1); draft motion to expedite hearing on stipulation, proposed order granting, and correspondence to court regarding same (.6); correspondence with B. Ramirez regarding tabulation agent declaration (.2); final review of ballots (.4); revisions to tabulation agent declaration (1.3); revisions to exhibit to tabulation agent declaration (1.8).	5.60 hrs	450 /hr	2,520.00
01/07/2021	BR	Finalize motion for expedited hearing and order; file and serve re same; prepare notice of hearing; file and serve re same; finalize tabulation summary; prepare witness and exhibit list for January 11 hearing.	2.90 hrs	175 /hr	507.50
01/07/2021	JMR	Revise ballot tabulation report and approve same (.3); correspondence on finalizing an filing same with G. Milligan and S. Lawrence (.2); analysis and revisions to motion to expedite stipulation and order with White Parties (.5); extensive revisions to Hinshaw document turnover stipulation and order with White Parties (1.6); correspondence with G. Milligan and N. Nelson on same (.3); correspondence with D. Williamson and B. Duke on same (.4); correspondence with G. Milligan	4.30 hrs	615 /hr	2,644.50

		Page		2	
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP		Invoice No:		132673	
For Professional Services Rendered		Invoice through:		01/31/2021	
	regarding hearing on 1/11 regarding settlement (.2); coordinate service of notice and preparation of witness and exhibit list on same (.3); follow up correspondence on advancing White Parties settlement (.3); analysis of means to impliment White Settlement in plan process and timing and notice options for same (.5)				
01/07/2021	SDL	Correspondence with Court and B. Ramirez regarding setting of expedited hearing on stipulation (.1); review stipulation related to discovery with White Parties and correspondence to J. Rudd regarding same (.2); revisions to notice of hearing (.1); revisions to tabulation agent declaration and exhibit (.9); correspondence with B. Ramirez regarding additional ballot information for inclusion in tabulation and revisions thereto (.5); correspondence regarding witness and exhibit list for hearing (.1).	1.90 hrs	450 /hr	855.00
01/08/2021	BR	Finalize witness and exhibit list; file re same.	0.60 hrs	175 /hr	105.00
01/08/2021	JMR	Telephone conference with K. Mercer regarding White Stipulation questions and issues and next steps on same (.5); analysis of issues raised on same (.5); correspondence with G. Milligan on same (.4); correspondence with D. Williamson on same (.4); consideration of witness and exhibits for 1/11 hearing and coordinate lists and filing of same (.4); telephone conference with G. Milligan on White requested change to release to address interests (.3); assessment of impact of same (.3); correspondence on same with D. Williamson (.3); finalize and file stipulation on turnover of Hinshaw documents (.6); correspondence with B. Duke on same (.3)	4.20 hrs	615 /hr	2,583.00
01/08/2021	SDL	Work on form of confirmation order (.5); Review stipulation and incorporate terms into revised plan (2.4); create redline of changes and correspondence with J. Rudd regarding same (.2); revise and finalize witness and exhibit list (.1); finalize stipulation related to discovery for filing and revisions to witness and exhibit list to include same (.1); call from creditor regarding plan treatment (.1).	3.40 hrs	450 /hr	1,530.00
01/10/2021	JMR	Analysis of stipulation and comments from D. Williamson and K. Mercer on same to inform revisions and incorporation into the plan (.5); revise stipulation to address same (.5); correspondence with D. Williamson on same (.4); correspondence with K. Mercer on same (.3); correspondence with G. Milligan on same (.2); initial outline of issues and preparations for hearing on stipulation (1.3)	3.20 hrs	615 /hr	1,968.00
01/11/2021	BR	Finalize proposed stipulation; file re same.	0.50 hrs	175 /hr	87.50
01/11/2021	JMR	Correspondence with G. Milligan and trustee team to advance resolution of stipulation with White Parties and related issues (.6); correspondence with D. Williamson regarding final approval of amended stipulation (.4); coordinate filing of amended stip and redline (.4); final preparations for hearing on White Parties Stipulation (2.5); appear for and represent	6.00 hrs	615 /hr	3,690.00

		Page		3	
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP		Invoice No:		132673	
For Professional Services Rendered		Invoice through:		01/31/2021	
	trustee at hearing on stipulation approval and related procedures (1.3); coordination call with S. Lawrence on hearing follow up to comply with court's instruction on plan modification (.3); correspondence on entry of Hinshaw document stipulation and compliance with same (.5);				
01/11/2021	JMR	Analysis and identification of documents to identify for production to White Parties under approved court stipulations (1.4); correspondence with N. Nelson on same (.2)	1.60 hrs	615 /hr	984.00
01/11/2021	SDL	Revisions to plan and stipulation (.4); draft notice of revised stipulation (.3); correspondence with B. Ramirez regarding stipulation and preparation for hearing (.2); correspondence with Court regarding same (.1); additional preparations for hearing on White Parties stipulation (.3); attend and participate in hearing on same (1.1); follow up correspondence and call with J. Rudd (.1); revisions to and finalize orders on stipulations with White Parties (.3); research and review forms of plan modification (1.2); begin draft of same (.8).	4.80 hrs	450 /hr	2,160.00
01/12/2021	BR	Finalize modification to plan; file and serve re same.	2.50 hrs	175 /hr	437.50
01/12/2021	JMR	Revisions to modification of plan per white parties stipulation (1.3); analysis of plan provisions impacted by same (.8) outline agenda items and prepare for trustee team call (.4); strategy conference with G. Milligan, E. White and legal team on advancing confirmation and related claim resolution (.5); follow up correspondence and call with S. Lawrence regarding modification and related order (.4); correspondence with G. Milligan on same (.2); correspondence on service of documents on White Parties per stipulation (.4); analysis of production and identify supplements for same (.9)	4.90 hrs	615 /hr	3,013.50
01/12/2021	SDL	Continue work on plan modification (.5); begin draft of proposed order regarding same (1.6); correspondence with B. Ramirez regarding service of plan modification (.4); call with Trustee and team regarding same (.4); finalize both documents (.4); review and implement revisions from J. Rudd (.8); continue revisions to same and related correspondence to J. Rudd (.8); additional correspondence and calls with B. Ramirez regarding finalizing and service of plan modification and order (.3); call and follow up correspondence with J. Rudd and Trustee regarding same (.1); correspondence with Court regarding same (.2); continue revisions to Trustee's declaration in support of confirmation (1.4).	6.90 hrs	450 /hr	3,105.00
01/13/2021	JMR	Initial review and revisions to updated trustee declaration (2.8); analysis of evidence and exhibits in support of same and burden at confirmation hearing (.8); correspondence with S. Lawrence on same (.3)	3.90 hrs	615 /hr	2,398.50
01/13/2021	SDL	Finalize new draft of Trustee's declaration in support of confirmation, including additional analysis regarding credit bid limitation motion, Lender	4.20 hrs	450 /hr	1,890.00

			Page		4
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP			Invoice No:		132673
For Professional Services Rendered			Invoice through:		01/31/2021
		settlement, White Parties settlement, and other revisions (4.2).			
01/14/2021	BR	Prepare certificate of service of plan modification; docket	0.50 hrs	175 /hr	87.50
01/14/2021	JMR	Outline agenda, outstanding items and next steps in advance of conference call with G. Milligan and team on same (.4); strategy call with G. Milligan and team to advance confirmation preparations (.5); continue to comment on, supplement and revise trustee declaration in support of plan confirmation (2.7); correspondence on balloting question (.1); follow up on modification service certificate(.1)	3.80 hrs	615 /hr	2,337.00
01/14/2021	SDL	Call with Trustee and team regarding confirmation preparation, confirmation order, Trustee declaration and related matters (.5); continue work on confirmation order (2.2); correspondence with B. Ramirez regarding certificate of service for plan modification and related order, and review and revise same (.1);	2.80 hrs	450 /hr	1,260.00
01/15/2021	JMR	Extensive revisions to declaration in support of plan confirmation (3.7); analysis of source documents to confirm statements in same (1.1); correspondence with G. Milligan on same (.2)	5.00 hrs	615 /hr	3,075.00
01/15/2021	SDL	Continue revisions to proposed confirmation order.	4.10 hrs	450 /hr	1,845.00
01/16/2021	SDL	Additional revisions to confirmation order.	1.80 hrs	450 /hr	810.00
01/17/2021	JMR	Analysis of G. Milligan comments to declaration in support of confirmation (.8); correspondence on same (.4)	1.20 hrs	615 /hr	738.00
01/18/2021	JMR	Analysis and revisions to draft confirmation order (1.8); correspondence on same with S. Lawrence (.2)	2.00 hrs	615 /hr	1,230.00
01/18/2021	SDL	Revisions to proposed confirmation order and correspondence to Trustee and team regarding same.	0.90 hrs	450 /hr	405.00
01/19/2021	BR	Prepare notice of confirmation order; serve re same.	1.50 hrs	175 /hr	262.50
01/19/2021	JMR	Follow up review and anlaysis of Creditor Trust agreement provisions to ensure no need for amendments of modifications in advance of confirmation hearing (.6)	0.60 hrs	615 /hr	369.00
01/19/2021	JMR	Correspondence with K. Mercer and D. Williamson regarding comments to plan modification (.3); analysis of language on same (.4); further review and comment to confirmation order (.5); correspondence on approval and filing of same (.4)	1.60 hrs	615 /hr	984.00
01/19/2021	SDL	Finalize confirmation order and notice regarding same.	0.60 hrs	450 /hr	270.00
01/20/2021	BR	Prepare witness and exhibit list for confirmation hearing.	0.30 hrs	175 /hr	52.50
01/20/2021	JMR	Conference with K. Mercer on confirmation order (.3); correspondence on same (.3); portion of trustee team planning call on advancing confirmation hearing preparations, including declaration, order and witness and exhibit lists (.7); draft outline agenda in preparation for same (.4); settlement correspondence with D. Williamson on language revisions to White Parties modification language	5.30 hrs	615 /hr	3,259.50

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Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP		Invoice No:		132673	
For Professional Services Rendered		Invoice through:		01/31/2021	
	(.4); conference call with T. Scannell on same (.3); review objection filed by K. Mercer (.4); further correspondence on language to resolve objections (.8); correspondence with T. Scannell on proposed confirmation order (.4); analysis of draft demonstrative for confirmation hearing and comment on same (.6); analysis of confirmation order, modification and related issues to inform preparations for confirmation hearing (1.0)				
01/20/2021	NBN	Assemble exhibits for plan confirmation hearing; correspond with S. Lawrence regarding same.	0.70 hrs	515 /hr	360.50
01/20/2021	SDL	Additional revisions to confirmation declaration (.6); correspondence with N. Nelson regarding same (.3); Call with Trustee and team regarding confirmation declaration and preparations for hearing regarding same (.2); additional revisions to Trustee declaration, including related to exhibits and review of exhibits related to same (1.5); correspondence with Trustee, J. Rudd, and counsel for White Parties regarding negotiations with Panache to resolve objection to Plan Modification (1.1).	3.70 hrs	450 /hr	1,665.00
01/21/2021	BR	Finalize SDL's supplemental declaration, Trustee's declaration, and witness and exhibit list; file re same.	1.40 hrs	175 /hr	245.00
01/21/2021	JMR	Follow up analysis of Trustee declaration to address White settlement and Panache objection and related updates and refinements (1.3); correspondence from trustee on same (.2); analysis of updated trustee comments (.3); Portion of trustee team planning call on advancing confirmation hearing preparations, including declaration, order and witness and exhibit lists (.6); final revise, revisions and approval of Trustee Declaration (.8); analysis of exhibits and proposed witness and exhibit list for confirmation hearing (.6); strategy call with S. Lawrence on same (.2); correspondence on Panache counsel change (.2); strategy session on preparations for confirmation hearing, outline remaining issues and related plan and claimant issues (1.2)	5.40 hrs	615 /hr	3,321.00
01/21/2021	SDL	Review and revise Trustee confirmation declaration regarding objection filed by Panache (.5); continue preparing and reviewing exhibits for confirmation (.4); call with Trustee and team regarding confirmation hearing preparations (.4); revisions to exhibit and witness list (.3); continue reviewing exhibits for confirmation hearing (.2); draft supplemental tabulation agent declaration (.8); correspondence with Trustee and team regarding additional confirmation exhibits and revisions to same (.3); calls with J. Rudd to discuss confirmation hearing preparations (.1); finalize Trustee declaration for filing (1.4); finalize witness and exhibit list and exhibits for filing (.4); calls and correspondence with B. Ramirez regarding same (.3).	5.10 hrs	450 /hr	2,295.00
01/22/2021	JMR	Conference with R. Horton on Panache related	4.70 hrs	615 /hr	2,890.50

		Page		6	
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP		Invoice No:		132673	
For Professional Services Rendered		Invoice through:		01/31/2021	
	items in plan and related disputes for resolution in advance of confirmation (.5); correspondence with Trustee team on same (.3); strategy conference with S. Lawrence on confirmation preparations (.4); conference call with K. Mercer on Panache and A1 claim issues and advancing resolution of same (.3); analysis of revised confirmation order and related comments from K. Mercer and T. Scannell (.8); analysis of strategy and related confirmation hearing preparations and updated (1.3); correspondence on exhibits (.3); analysis of updated comments to confirmation order (.6); correspondence with trustee team on same (.2)				
01/22/2021	SDL	Review proposed changes to confirmation order from counsel to Panache and analyze impact on various plan provisions.	0.80 hrs	450 /hr	360.00
01/23/2021	JMR	Analysis of BK confirmation and settlement provisions and checklist in advance of confirmation hearing (1.5); initial outline of confirmation presentation and potential issued spotting and potential quesitons that Judge Mott or UST could present and responses to same (2.6)	4.10 hrs	615 /hr	2,521.50
01/24/2021	JMR	Analysis of comments and redlines to confirmation order and corresponding plan comments (.8); correspondence with s. Lawrence on same (.2); correspondence with Trustee team on hearing preparation and planning (.2)	1.20 hrs	615 /hr	738.00
01/25/2021	BR	Finalize amended liquidating plan; file re same.	0.40 hrs	175 /hr	70.00
01/25/2021	JMR	Final review of revised and redlined confirmation order and plan (1.5); trustee team call on confirmation preparations and outstanding items (.5); draft outline of argument for confirmation hearing presentation (1.8); analysis of plan and trust provision to inform any Court questions on same (2.6); strategy conference with S. Lawrence on same (.3)	6.70 hrs	615 /hr	4,120.50
01/25/2021	SDL	Review and revise confirmation order and prepare redline of latest changes to prior filed version (.6); review and revise plan and prepare redline of latest changes to prior filed version (.8); correspondence and call with Trustee and team regarding same (.3); finalize documents and circulate to primary parties in case (.6); additional review and revisions to Plan (.5); review various filings in the case and prepare notice of revisions to plan and confirmation order (1.7); review pleadings and exhibits to support confirmation (1.5); correspondence with Court, Trustee and team regarding same (.2).	6.20 hrs	450 /hr	2,790.00
01/26/2021	JMR	Final preparation of outline of arguments, potential issue spotting and exhibit presentation for confirmation hearing (2.5); Strategy conference with G. Milligan and Trustee team in advance of hearing (.3); appear for confirmation hearing (.8); posthearing conference with G. Milligan and Trustee team (.4); review and approval of revised confirmation order (.3); correspondence on same (.2); outline Effective Date preparations and respond	4.60 hrs	615 /hr	2,829.00

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Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP			Invoice No:	132673	
For Professional Services Rendered			Invoice through:	01/31/2021	
		to G. Milligan distribution and trust operation questions (.9)			
01/26/2021	SDL	Continue reviewing pleadings and exhibits in preparation for confirmation hearing (1.2); call with Trustee and team regarding same (.2); continue preparations for confirmation hearing (.6); correspondence to J. Rudd regarding same (.4); attend and participate in confirmation hearing (.6); follow up call with Trustee and team regarding next steps (.5); revisions and finalize proposed confirmation order (.8); correspondence with court regarding same (.2).	4.50 hrs	450 /hr	2,025.00
01/27/2021	JMR	Coordinate effective date preparations with S. Lawrence (.2); correspondence on confirmation order entry (.2)	0.40 hrs	615 /hr	246.00
01/27/2021	SDL	Revise proposed confirmation order and re-submit (.2); correspondence with B. Ramirez regarding same and transcript of confirmation hearing (.1);	0.30 hrs	450 /hr	135.00
01/28/2021	JMR	Strategy call with S. Lawrence to advance Effective Date preparations (.3); correspondence with G. Milligan and trustee team on same (.2); analysis of effective date check list and comment on same (.3)	0.80 hrs	615 /hr	492.00
01/28/2021	SDL	Call with J. Rudd to discuss items needed for plan to go effective (.1); revisions to trust agreement for execution (.4); revisions to notice of entry of confirmation order and notice of occurrence of effective date (.5); correspondence to Trustee and team regarding same (.6); review of plan, confirmation order and related documents in connection with same (.9).	2.50 hrs	450 /hr	1,125.00
01/29/2021	JMR	Strategy conference with S. Lawrence regarding advancing effective date preparations and items (.3); follow up correspondence on same (.2)	0.50 hrs	615 /hr	307.50
01/29/2021	SDL	Call with Trustee and Team regarding next steps for plan to go effective.	0.20 hrs	450 /hr	90.00
Total fees for this matter			167.00 hrs		86,338.50

DISBURSEMENTS

01/13/2021	Postage. (BR)	120.23
01/13/2021	Copies (BR)	316.80
01/21/2021	Classic Legal Document Services, Inc.	159.85
01/25/2021	Inventus - Litigation support vendors	535.06
Total disbursements for this matter		\$1,131.94



Greg Milligan as proposed ch 11 trustee of  
3443 Zen Garden LP  
For Professional Services Rendered

Page 8  
Invoice No: 132673  
Invoice through: 01/31/2021

**BILLING SUMMARY**

TOTAL FEES	\$86,338.50
TOTAL DISBURSEMENTS	\$1,131.94
TOTAL CHARGES FOR THIS BILL	\$87,470.44
NET BALANCE FORWARD	\$30,236.00
TOTAL BALANCE NOW DUE	\$117,706.44

**Timekeeper Summary**

Name			Hours	Rate	Amount
Legal Assistant	BR	Brenda Ramirez	12.40	175.00	\$2,170.00
Partner	JMR	Jason M Rudd	88.20	615.00	\$54,243.00
Partner	NBN	Nick B. Nelson	0.70	515.00	\$360.50
Associate	SDL	Scott D. Lawrence	65.70	450.00	\$29,565.00
			167.00		\$86,338.50

**Required Notice to Clients.**

THE STATE BAR OF TEXAS INVESTIGATES AND PROSECUTES PROFESSIONAL MISCONDUCT COMMITTED BY TEXAS ATTORNEYS. ALTHOUGH NOT EVERY COMPLAINT AGAINST OR DISPUTE WITH A LAWYER INVOLVES PROFESSIONAL MISCONDUCT, THE STATE BAR'S OFFICE OR GENERAL COUNSEL WILL PROVIDE YOU WITH INFORMATION ABOUT HOW TO FILE A COMPLAINT. PLEASE CALL 1-800-932-1900 TOLL-FREE FOR MORE INFORMATION.

## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200 phone  
(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

February 3, 2021

Invoice No: 132674  
Our File No: 7066-10 JMR  
Billing through: 01/31/2021

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Claims Administration and Objections

TOTAL FEES	\$14,727.00
TOTAL DISBURSEMENTS	\$222.65
TOTAL CHARGES FOR THIS BILL	<hr/> \$14,949.65
NET BALANCE FORWARD	\$11,819.70
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$26,769.35</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax No. 45-4183914

February 3, 2021

Invoice No. 132674  
Reference No. 7066-10 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Claims Administration and Objections

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
128953	11/06/2020	10	JMR	\$168.00	\$33.60
130175	12/03/2020	10	JMR	\$29,627.50	\$5,925.50
131690	01/08/2021	10	JMR	\$29,450.44	\$5,860.60
Total Outstanding Balance					\$11,819.70
Total Amount Due on this Invoice					\$14,949.65
Total Balance Now Due					<u>\$26,769.35</u>

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$5,860.60	\$0.00	\$5,959.10	\$0.00	\$0.00	\$11,819.70

Please remit payment within 30 days. Thank you!

**Wick Phillips Gould & Martin, LLP**

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

February 3, 2021

Invoice No: 132674  
Our File No: 7066-10 JMR  
Billing through: 01/31/2021

Greg Milligan  
Attn: Gregory S. Milligan

**Claims Administration and Objections**

Balance forward as of invoice dated 01/08/2021	\$35,409.54
Payments received since last invoice	\$23,589.84
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$11,819.70</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

01/04/2021	SDL	Correspondence with Court regarding proposed orders on claims objections.	0.10 hrs	450 /hr	45.00
01/05/2021	JMR	Correspondence with Hinshaw regarding stipulation (.2); correspondence on and analysis of claim settlements to potential to increase recovery (.4)	0.40 hrs	615 /hr	246.00
01/09/2021	JMR	Correspondence with E. White and trustee team on resolution of paid claims and stipulations on same (.2)	0.20 hrs	615 /hr	123.00
01/11/2021	BR	Prepare proposed order for Wembley objection.	0.20 hrs	175 /hr	35.00
01/11/2021	SDL	Correspondence with B. Ramirez regarding proposed order on Wembley objection (.1); review and revise same (.1).	0.20 hrs	450 /hr	90.00
01/12/2021	NBN	Correspond with counsel for White Parties regarding production of documents; coordinate production of documents.	1.50 hrs	515 /hr	772.50
01/13/2021	JMR	Correspondence with A. Zarafshani regarding claim objections (.2); correspondence with M. Carter on Hinshaw claim (.2); analysis of other claims to address stipulations and withdrawals (.4)	0.80 hrs	615 /hr	492.00
01/14/2021	JMR	Portion of trustee team call regarding claims issues (.2); analysis of claims estimates and recoveries on same (.4); correspondence regarding Trane, Hinshaw and Schinder (.3); correspondence on Class 9 claim creditor inquiries (.3)	1.20 hrs	615 /hr	738.00
01/20/2021	JMR	Correspondence with M. Carter at Hinshaw regarding stipulation to resolve objection (.3); follow up correspondence with trustee team on same (.1)	0.40 hrs	615 /hr	246.00
01/21/2021	SDL	Review stipulation from Hinshaw regarding claim	0.40 hrs	450 /hr	180.00

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Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP		Invoice No:		132674	
For Professional Services Rendered		Invoice through:		01/31/2021	
01/22/2021	JMR	(.3); correspondence and call with J. Rudd regarding same (.1). Settlement conference with Hinshaw regarding objection to secured claim and related proposed stipulation (.5); strategy conference with S. Lawrence on same (.4); analysis of revisions to Hinshaw stipulation (.5); correspondence on Hinshaw engagement letter (.3); document review for same (.4); follow up correspondence with M. Carter (.2)	2.30 hrs	615 /hr	1,414.50
01/22/2021	SDL	Correspondence and call with J. Rudd to plan for call regarding Hinshaw claim resolution (.2); correspondence with M. Carter regarding same (.3); call with M. Carter regarding same (.4); work on revisions to proposed stipulation (.2); follow up calls and correspondence with N. Nelson and J.Rudd (.7); call and correspondence with T. Scannell regarding same (.1); research forms and rules applicable to omnibus claims objection (.8); research lien issues under law applicable to Hinshaw claims (.6).	3.30 hrs	450 /hr	1,485.00
01/23/2021	SDL	Initial draft of omnibus objection to satisfied claims.	1.90 hrs	450 /hr	855.00
01/24/2021	JMR	Revised Hinshaw stipulation to address secured claim request issues (.5); Correspondence with M. Carter regarding Hinshaw secured claim and disputes on same and related non-debtor invoice (.4)	0.90 hrs	615 /hr	553.50
01/24/2021	SDL	Finalize draft of omnibus objection to satisfied claims.	2.40 hrs	450 /hr	1,080.00
01/24/2021	SDL	Review correspondence from M. Carter regarding Hinshaw claim, including cross reference to objection in same (.4); analysis and correspondence to J. Rudd regarding same (.2).	0.60 hrs	450 /hr	270.00
01/25/2021	BR	Finalize omnibus objection to claims; file and serve re same.	1.60 hrs	175 /hr	280.00
01/25/2021	JMR	Analysis and comment on omnibus objection to satisfied claims (.5); correspondence with S. Lawrence and E. White on same (.3); analysis and comment on M. Carter revised stipulation (.5); telephone conferences (3) with M. Carter on same (.6); telephone conferences (2) with G. Milligan on same (.6); follow up correspondence with M. Carter on release language negotiations (.5); further revisions to stipulation based on call with M. Carter (.4); review and approve final redlined stipulation (.2); correspondence for Trustee approval of same (.3); further conference call with M. Carter on additional comments to stipulation (.3); review of M. Carter further revised stipulation (.4); correspondence with Trustee for approval of same (.3)	5.20 hrs	615 /hr	3,198.00
01/25/2021	SDL	Review and revise omnibus objection (.6); calls and correspondence with Trustee and team regarding efforts to secure satisfaction of claims (.4); correspondence to Trustee and team regarding same (.5); correspondence with lender regarding Hinshaw matters (.1); review proposed stipulation	4.60 hrs	450 /hr	2,070.00

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP	Page	2
For Professional Services Rendered	Invoice No:	132674
	Invoice through:	01/31/2021

		from Hinshaw (.2); correspondence to J. Rudd regarding same (.2); additional revisions to omnibus objection (.3); correspondence regarding service of same (.2); revisions to Hinshaw stipulation and correspondence and call with J. Rudd and Hinshaw counsel regarding same (.9); finalize omnibus objection for filing and correspondence with B. Ramirez regarding same (.8); additional correspondence regarding satisfaction of claims (.4).			
01/26/2021	JMR	Review of final revised Hinshaw stipulation from M. Carter and approve same for filing (.4); correspondence with M. Carter on same (.2)	0.60 hrs	615 /hr	369.00
01/27/2021	JMR	Correspondence on pending claim objections with S. Lawrence (.1)	0.10 hrs	615 /hr	61.50
01/29/2021	JMR	Correspondence on status of claim objection resolutions (.2)	0.20 hrs	615 /hr	123.00
Total fees for this matter			29.10 hrs		14,727.00

DISBURSEMENTS

01/26/2021	Postage. (BR)			39.65
01/26/2021	Copies (BR)			183.00
Total disbursements for this matter				\$222.65

Greg Milligan as proposed ch 11 trustee of  
3443 Zen Garden LP  
For Professional Services Rendered

Page 3  
Invoice No: 132674  
Invoice through: 01/31/2021

**BILLING SUMMARY**

TOTAL FEES	\$14,727.00
TOTAL DISBURSEMENTS	\$222.65
TOTAL CHARGES FOR THIS BILL	\$14,949.65
NET BALANCE FORWARD	\$11,819.70
TOTAL BALANCE NOW DUE	\$26,769.35

**Timekeeper Summary**

Name			Hours	Rate	Amount
Legal Assistant	BR	Brenda Ramirez	1.80	175.00	\$315.00
Partner	JMR	Jason M Rudd	12.30	615.00	\$7,564.50
Partner	NBN	Nick B. Nelson	1.50	515.00	\$772.50
Associate	SDL	Scott D. Lawrence	13.50	450.00	\$6,075.00
			29.10		\$14,727.00

**Required Notice to Clients.**

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## Wick Phillips Gould & Martin, LLP

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Suite 500  
Dallas, TX 75204  
(214) 692-6200 phone  
(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

February 3, 2021

Invoice No: 132675  
Our File No: 7066-17 JMR  
Billing through: 01/31/2021

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Meetings and Communications with Creditors

TOTAL FEES	\$450.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$450.00
NET BALANCE FORWARD	\$473.20
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$923.20</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!



## Wick Phillips Gould & Martin, LLP

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Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax No. 45-4183914

February 3, 2021

Invoice No. 132675  
Reference No. 7066-17 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Meetings and Communications with Creditors

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
128951	11/06/2020	17	JMR	\$686.00	\$137.20
130178	12/03/2020	17	JMR	\$1,680.00	\$336.00
Total Outstanding Balance					\$473.20
Total Amount Due on this Invoice					\$450.00
Total Balance Now Due					\$923.20

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$0.00	\$0.00	\$473.20	\$0.00	\$0.00	\$473.20

Please remit payment within 30 days. Thank you!

**Wick Phillips Gould & Martin, LLP**

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

February 3, 2021

Invoice No: 132675  
Our File No: 7066-17 JMR  
Billing through: 01/31/2021

Greg Milligan  
Attn: Gregory S. Milligan

**Meetings and Communications with Creditors**

Balance forward as of invoice dated 12/03/2020	\$2,662.80
Payments received since last invoice	\$2,189.60
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$473.20</u>
Trust balance carried forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

01/11/2021	SDL	Correspondence with potential claimant about and research regarding impact on claimant of prior claims objections.	0.30 hrs	450 /hr	135.00
01/12/2021	SDL	Research regarding claims of inquiring claimant and correspondence related to same.	0.30 hrs	450 /hr	135.00
01/14/2021	SDL	Research and correspondence with creditor regarding distributions under plan (.1); correspondence with creditor regarding outstanding issues in case (.1).	0.20 hrs	450 /hr	90.00
01/27/2021	SDL	Correspondence with creditor regarding case status.	0.10 hrs	450 /hr	45.00
01/29/2021	SDL	Correspondence to Hinshaw regarding claim and entry of stipulation.	0.10 hrs	450 /hr	45.00
Total fees for this matter			<u>1.00 hrs</u>		<u>450.00</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP For Professional Services Rendered	Page 1 Invoice No: 132675 Invoice through: 01/31/2021
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**BILLING SUMMARY**

TOTAL FEES	\$450.00
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$450.00
NET BALANCE FORWARD	\$473.20
TOTAL BALANCE NOW DUE	\$923.20

**Timekeeper Summary**

Name		Hours	Rate	Amount	
Associate	SDL	Scott D. Lawrence	1.00	450.00	\$450.00
			1.00		\$450.00

**Required Notice to Clients.**

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## Wick Phillips Gould & Martin, LLP

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Suite 500  
Dallas, TX 75204  
(214) 692-6200 phone  
(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

February 23, 2021

Invoice No: 134104  
Our File No: 7066-13 JMR  
Billing through: 02/23/2021

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Employment and Fee Applications

TOTAL FEES	\$0.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$0.00
NET BALANCE FORWARD	\$5,270.42
TOTAL BALANCE NOW DUE	<div>\$5,270.42</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax No. 45-4183914

February 23, 2021

Invoice No. 134104  
Reference No. 7066-13 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Employment and Fee Applications

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
128946	11/06/2020	13	JMR	\$7,378.00	\$1,475.60
130179	12/03/2020	13	JMR	\$14,498.30	\$2,713.62
131381	01/08/2021	13	JMR	\$498.50	\$99.70
132668	02/03/2021	13	JMR	\$981.50	\$981.50
Total Outstanding Balance					\$5,270.42
Total Amount Due on this Invoice					\$0.00
Total Balance Now Due					\$5,270.42

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$981.50	\$99.70	\$2,713.62	\$1,475.60	\$0.00	\$5,270.42

Please remit payment within 30 days. Thank you!

**Wick Phillips Gould & Martin, LLP**

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

February 23, 2021

Invoice No: 134104  
Our File No: 7066-13 JMR  
Billing through: 02/23/2021

Greg Milligan  
Attn: Gregory S. Milligan

**Employment and Fee Applications**

Balance forward as of invoice dated 02/03/2021	\$5,270.42
Payments received since last invoice	\$0.00
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$5,270.42</u>
Trust balance carried forward	\$0.00

**BILLING SUMMARY**

TOTAL FEES	\$0.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	\$0.00
NET BALANCE FORWARD	\$5,270.42
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$5,270.42</div>

**Required Notice to Clients.**

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## Wick Phillips Gould & Martin, LLP

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Federal Tax No: 45-4183914

February 23, 2021

Invoice No: 134099  
Our File No: 7066-15 JMR  
Billing through: 02/23/2021

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Financing and Cash Collateral

TOTAL FEES	\$0.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$0.00
NET BALANCE FORWARD	\$938.00
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$938.00</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax No. 45-4183914

February 23, 2021

Invoice No. 134099  
Reference No. 7066-15 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Financing and Cash Collateral

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
128956	11/06/2020	15	JMR	\$1,106.00	\$221.20
130176	12/03/2020	15	JMR	\$2,968.00	\$593.60
131377	01/08/2021	15	JMR	\$616.00	\$123.20
Total Outstanding Balance					\$938.00
Total Amount Due on this Invoice					\$0.00
Total Balance Now Due					\$938.00

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$0.00	\$123.20	\$593.60	\$221.20	\$0.00	\$938.00

Please remit payment within 30 days. Thank you!



**Wick Phillips Gould & Martin, LLP**

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(214) 692-6255  
Federal Tax ID: 45-4183914

February 23, 2021

Invoice No: 134099  
Our File No: 7066-15 JMR  
Billing through: 02/23/2021

Greg Milligan  
Attn: Gregory S. Milligan

**Financing and Cash Collateral**

Balance forward as of invoice dated 01/08/2021	\$1,430.80
Payments received since last invoice	\$492.80
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$938.00</u>
Trust balance carried forward	\$0.00

**BILLING SUMMARY**

TOTAL FEES	\$0.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	\$0.00
NET BALANCE FORWARD	\$938.00
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$938.00</div>

**Required Notice to Clients.**

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## Wick Phillips Gould & Martin, LLP

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(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

February 23, 2021

Invoice No: 134100  
Our File No: 7066-14 JMR  
Billing through: 02/23/2021

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Employment and Fee Application Objections

TOTAL FEES	\$0.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$0.00
NET BALANCE FORWARD	\$0.00
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$0.00</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP  
Please include invoice number on payment. Thank you!

**Wick Phillips Gould & Martin, LLP**

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Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

February 23, 2021

Invoice No: 134100  
Our File No: 7066-14 JMR  
Billing through: 02/23/2021

Greg Milligan  
Attn: Gregory S. Milligan

**Employment and Fee Application Objections**

Balance forward as of invoice dated 10/07/2020	\$1,736.00
Payments received since last invoice	\$1,736.00
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$0.00</u>
Trust balance carried forward	\$0.00

**BILLING SUMMARY**

TOTAL FEES	\$0.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	\$0.00
NET BALANCE FORWARD	\$0.00
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$0.00</div>

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Federal Tax No: 45-4183914

February 23, 2021

Invoice No: 134101  
Our File No: 7066-08 JMR  
Billing through: 02/23/2021

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Business Operations

TOTAL FEES	\$0.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$0.00
NET BALANCE FORWARD	\$369.60
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$369.60</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

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Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax No. 45-4183914

February 23, 2021

Invoice No. 134101  
Reference No. 7066-08 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Business Operations

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
128952	11/06/2020	08	JMR	\$1,848.00	\$369.60
Total Outstanding Balance					\$369.60
Total Amount Due on this Invoice					\$0.00
Total Balance Now Due					\$369.60

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$0.00	\$0.00	\$0.00	\$369.60	\$0.00	\$369.60

Please remit payment within 30 days. Thank you!

**Wick Phillips Gould & Martin, LLP**

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

February 23, 2021

Invoice No: 134101  
Our File No: 7066-08 JMR  
Billing through: 02/23/2021

Greg Milligan  
Attn: Gregory S. Milligan

**Business Operations**

Balance forward as of invoice dated 11/06/2020	\$5,692.80
Payments received since last invoice	\$5,323.20
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$369.60</u>
Trust balance carried forward	\$0.00

**BILLING SUMMARY**

TOTAL FEES	\$0.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	\$0.00
NET BALANCE FORWARD	\$369.60
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$369.60</div>

**Required Notice to Clients.**

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Suite 500  
Dallas, TX 75204  
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(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

February 26, 2021

Invoice No: 134098  
Our File No: 7066-19 JMR  
Billing through: 02/23/2021

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Plan and Disclosure Statement

TOTAL FEES	\$3,385.00
TOTAL DISBURSEMENTS	\$314.89
TOTAL CHARGES FOR THIS BILL	<hr/> \$3,699.89
NET BALANCE FORWARD	\$47,503.70
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$51,203.59</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

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Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax No. 45-4183914  
February 26, 2021

Invoice No. 134098  
Reference No. 7066-19 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Plan and Disclosure Statement

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
128954	11/06/2020	19	JMR	\$59,864.00	\$11,972.80
130180	12/03/2020	19	JMR	\$36,973.50	\$7,394.70
131376	01/08/2021	19	JMR	\$58,641.21	\$10,868.50
132673	02/03/2021	19	JMR	\$87,470.44	\$17,267.70
Total Outstanding Balance					\$47,503.70
Total Amount Due on this Invoice					\$3,699.89
Total Balance Now Due					\$51,203.59

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$17,267.70	\$10,868.50	\$7,394.70	\$11,972.80	\$0.00	\$47,503.70

Please remit payment within 30 days. Thank you!



Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

February 26, 2021

Invoice No: 134098  
Our File No: 7066-19 JMR  
Billing through: 02/23/2021

Greg Milligan  
Attn: Gregory S. Milligan

Plan and Disclosure Statement

Balance forward as of invoice dated 02/03/2021	\$117,706.44
Payments received since last invoice	\$70,202.74
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$47,503.70</u>
Trust balance carried forward	\$0.00

FOR PROFESSIONAL SERVICES RENDERED

02/01/2021	BR	Prepare affidavit of service; prepare service list.	2.40 hrs	175 /hr	420.00
02/01/2021	JMR	Review outline and correspondence regarding status and update on Effective date items (.4); Conference call with G. Milligan and Trustee team to advance preparations for Effective Date (.6); correspondence on final revisions and execution of Trust agreement (.2); review redline of final Trust Agreement to confirm changes (.2)	1.40 hrs	615 /hr	861.00
02/01/2021	SDL	Call with Trustee and Team regarding timing and conditions precedent to occurrence of effective date (.3); finalize notice of same (.2); review and revise service lists for same (.5); review documents in Trustee Team's shared folders correspondence with B. Ramirez regarding same (.8); revise, circulate, and review final version of Trust Agreement (.4); review supplementary service list from B. Ramirez and call with J. Rudd regarding same (.1); additional revisions to service lists and notice of confirmation order and effective date (.4).	2.60 hrs	450 /hr	1,170.00
02/02/2021	BR	Finalize notice of entry of effective date; file re same.	0.40 hrs	175 /hr	70.00
02/02/2021	JMR	Review and approve notice of effective date and entry of confirmation order (.2); correspondence on same (.2); correspondence on effective date transfers and related issued (.2)	0.60 hrs	615 /hr	369.00
02/02/2021	SDL	Review service lists and correspondence to Panache regarding same (.2); update correspondence to B. Ramirez regarding notice of effective date and draft affidavit of service regarding	1.10 hrs	450 /hr	495.00

Greg Milligan as proposed ch 11 trustee of  
3443 Zen Garden LP  
For Professional Services Rendered

Page 1  
Invoice No: 134098  
Invoice through: 02/23/2021

same (.2); additional revisions to notice and  
correspondence to J. Rudd regarding same (.1);  
correspondence with G. Milligan regarding same  
(.1); finalize notice for filing (.2); correspondence  
with B. Ramirez regarding revisions to service list  
and related issues (.3).

Total fees for this matter	8.50 hrs	3,385.00
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**DISBURSEMENTS**

01/23/2021	UPS - Delivery	24.75
01/23/2021	UPS - Delivery	29.69
02/03/2021	Exact Legal Copy Services LLC - Mail out	260.45
Total disbursements for this matter		\$314.89

**BILLING SUMMARY**

TOTAL FEES	\$3,385.00
TOTAL DISBURSEMENTS	\$314.89
TOTAL CHARGES FOR THIS BILL	\$3,699.89
NET BALANCE FORWARD	\$47,503.70
TOTAL BALANCE NOW DUE	\$51,203.59

**Timekeeper Summary**

Name			Hours	Rate	Amount
Legal Assistant	BR	Brenda Ramirez	2.80	175.00	\$490.00
Partner	JMR	Jason M Rudd	2.00	615.00	\$1,230.00
Associate	SDL	Scott D. Lawrence	3.70	450.00	\$1,665.00
			8.50		\$3,385.00

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## Wick Phillips Gould & Martin, LLP

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(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

February 26, 2021

Invoice No: 134102  
Our File No: 7066-04 JMR  
Billing through: 02/23/2021

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Asset Disposition

TOTAL FEES	\$2,250.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$2,250.00
NET BALANCE FORWARD	\$5,241.90
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$7,491.90</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP

Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

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Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax No. 45-4183914

February 26, 2021

Invoice No. 134102  
Reference No. 7066-04 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Asset Disposition

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
128949	11/06/2020	04	JMR	\$22,521.50	\$4,504.30
130174	12/03/2020	04	JMR	\$448.00	\$89.60
132672	02/03/2021	04	JMR	\$3,240.00	\$648.00
Total Outstanding Balance					\$5,241.90
Total Amount Due on this Invoice					\$2,250.00
Total Balance Now Due					<u>\$7,491.90</u>

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$648.00	\$0.00	\$89.60	\$4,504.30	\$0.00	\$5,241.90

Please remit payment within 30 days. Thank you!

Wick Phillips Gould & Martin, LLP

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(214) 692-6255  
Federal Tax ID: 45-4183914

February 26, 2021

Invoice No: 134102  
Our File No: 7066-04 JMR  
Billing through: 02/23/2021

Greg Milligan  
Attn: Gregory S. Milligan

Asset Disposition

Balance forward as of invoice dated 02/03/2021	\$7,833.90
Payments received since last invoice	\$2,592.00
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$5,241.90</u>
Trust balance carried forward	\$0.00

FOR PROFESSIONAL SERVICES RENDERED

01/01/2021	SDL	Continue draft and developing background for bid procedures motion.	0.90 hrs	450 /hr	405.00
02/01/2021	SDL	Call with Trustee and Team regarding status of assignment agreement, timing, and revisions (.3); review revisions to assignment agreement and attachments (.5); additional revisions to same (.5); revisions to assignment (1.2); correspondence to J. Rudd and N. Nelson regarding same (.3); call with J. Rudd regarding same (.1); finalize all and circulate to Trustee and team (.4).	3.30 hrs	450 /hr	1,485.00
02/02/2021	SDL	Revisions to assignment agreement and finalize (.2); revisions to assignment and finalize (.2); correspondence to counsel for Panache regarding assignment agreement and attachments for review (.4).	0.80 hrs	450 /hr	360.00
Total fees for this matter			<u>5.00 hrs</u>		<u>2,250.00</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP For Professional Services Rendered	Page 1 Invoice No: 134102 Invoice through: 02/23/2021
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BILLING SUMMARY

TOTAL FEES	\$2,250.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	\$2,250.00
NET BALANCE FORWARD	\$5,241.90
TOTAL BALANCE NOW DUE	\$7,491.90

Timekeeper Summary

Name	Hours	Rate	Amount
Associate     SDL     Scott D. Lawrence	5.00	450.00	\$2,250.00
	5.00		\$2,250.00

Required Notice to Clients.

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## Wick Phillips Gould & Martin, LLP

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Federal Tax No: 45-4183914

February 26, 2021

Invoice No: 134103  
Our File No: 7066-03 JMR  
Billing through: 02/23/2021

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Asset Analysis and Recovery

TOTAL FEES	\$2,761.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$2,761.00
NET BALANCE FORWARD	\$2,649.50
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$5,410.50</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP  
Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax No. 45-4183914

February 26, 2021

Invoice No. 134103  
Reference No. 7066-03 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Asset Analysis and Recovery

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
128948	11/06/2020	03	JMR	\$2,227.50	\$445.50
130173	12/03/2020	03	JMR	\$896.00	\$179.20
131378	01/08/2021	03	JMR	\$728.00	\$145.60
132671	02/03/2021	03	JMR	\$9,396.00	\$1,879.20
Total Outstanding Balance					\$2,649.50
Total Amount Due on this Invoice					\$2,761.00
Total Balance Now Due					\$5,410.50

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$1,879.20	\$145.60	\$179.20	\$445.50	\$0.00	\$2,649.50

Please remit payment within 30 days. Thank you!



Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

February 26, 2021

Invoice No: 134103  
Our File No: 7066-03 JMR  
Billing through: 02/23/2021

Greg Milligan  
Attn: Gregory S. Milligan

Asset Analysis and Recovery

Balance forward as of invoice dated 02/03/2021	\$10,166.30
Payments received since last invoice	\$7,516.80
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$2,649.50</u>
Trust balance carried forward	\$0.00

FOR PROFESSIONAL SERVICES RENDERED

01/01/2021	SDL	Call with D. Heringer to discuss research related to recovery on potential causes of action.	0.30 hrs	450 /hr	135.00
02/01/2021	JMR	Analysis and extensive revisions to settlement agreement with Panache on disposition of A1/NAE claim (1.6); correspondence with S. Lawrence, N. Nelson and G. Milligan on same (.4); analysis and comment on claim assignment document (.6); follow correspondence with S. Lawrence and G. Milligan on same (.3)	2.90 hrs	615 /hr	1,783.50
02/01/2021	NBN	Attend call with client regarding claims assignment; review assignment agreement and claims description.	0.80 hrs	515 /hr	412.00
02/02/2021	JMR	Correspondence on A1 claim assignment negotiation documents and drafts (.3); analysis of revisions to same (.4)	0.70 hrs	615 /hr	430.50
Total fees for this matter			<u>4.70 hrs</u>		<u>2,761.00</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP	Page 1
For Professional Services Rendered	Invoice No: 134103
	Invoice through: 02/23/2021

**BILLING SUMMARY**

TOTAL FEES	\$2,761.00
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$2,761.00
NET BALANCE FORWARD	\$2,649.50
TOTAL BALANCE NOW DUE	\$5,410.50

**Timekeeper Summary**

Name			Hours	Rate	Amount
Partner	JMR	Jason M Rudd	3.60	615.00	\$2,214.00
Partner	NBN	Nick B. Nelson	0.80	515.00	\$412.00
Associate	SDL	Scott D. Lawrence	0.30	450.00	\$135.00
			4.70		\$2,761.00

**Required Notice to Clients.**

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(214) 692-6200 phone  
(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

February 26, 2021

Invoice No: 134105  
Our File No: 7066-25 JMR  
Billing through: 02/23/2021

Greg Milligan  
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden, LP  
Email to: gmilligan@harneypartners.com

### Matter Summary

RE: Challenge Investigation

TOTAL FEES	\$7,695.50
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$7,695.50
NET BALANCE FORWARD	\$0.00
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$7,695.50</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP  
Please include invoice number on payment. Thank you!

Wick Phillips Gould & Martin, LLP

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Suite 500  
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(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

February 26, 2021

Invoice No: 134105  
Our File No: 7066-25 JMR  
Billing through: 02/23/2021

Greg Milligan  
Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden, LP  
Email to: gmilligan@harneypartners.com

Challenge Investigation

Balance forward as of invoice dated 10/07/2020	\$25,287.00
Payments received since last invoice	\$25,287.00
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$0.00</u>
Trust balance carried forward	\$0.00

FOR PROFESSIONAL SERVICES RENDERED

01/01/2021	BR	Finalize notice and stipulation extending removables challenge deadlines.	0.40 hrs	175 /hr	70.00
01/01/2021	JMR	Research and analysis of handling of credit bid protections in context of auction and draft motion related to auction process (3.5)	3.50 hrs	615 /hr	2,152.50
01/01/2021	JMR	Draft and strategy and related preparations regarding credit bid challenge motion (2.5); correspondence and strategy on same (.5); telephone conference with Trustee on same (.2)	3.20 hrs	615 /hr	1,968.00
01/01/2021	JMR	Revise, finalize and file credit bid challenge motion (4.5).	4.50 hrs	615 /hr	2,767.50
01/01/2021	MWB	Draft and revise memorandum regarding loan documents and perfection of liens.	0.50 hrs	575 /hr	287.50
01/01/2021	SDL	Call with N. Nelson, Trustee, E. White and J. Rudd to discuss challenge investigation and next steps regarding same (.3); correspondence with E. White and Trustee regarding protective advances (.2);	0.50 hrs	450 /hr	225.00
01/01/2021	SDL	Call with J. Rudd, N. Nelson and B. Ramirez regarding witness and exhibit lists for credit bid motion and other hearing preparation.	0.50 hrs	450 /hr	225.00
Total fees for this matter			<u>13.10 hrs</u>		<u>7,695.50</u>

Greg Milligan as proposed ch 11 trustee of  
3443 Zen Garden LP  
For Professional Services Rendered

Page 1  
Invoice No: 134105  
Invoice through: 02/23/2021

**BILLING SUMMARY**

TOTAL FEES	\$7,695.50
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$7,695.50
NET BALANCE FORWARD	\$0.00
TOTAL BALANCE NOW DUE	\$7,695.50

**Timekeeper Summary**

Name			Hours	Rate	Amount
Legal Assistant	BR	Brenda Ramirez	0.40	175.00	\$70.00
Partner	JMR	Jason M Rudd	11.20	615.00	\$6,888.00
Partner	MWB	Michael W Bailey	0.50	575.00	\$287.50
Associate	SDL	Scott D. Lawrence	1.00	450.00	\$450.00
			13.10		\$7,695.50

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Suite 500  
Dallas, TX 75204  
(214) 692-6200 phone  
(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

March 1, 2021

Invoice No: 135035  
Our File No: 7066-09 JMR  
Billing through: 02/28/2021

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Case Administration

TOTAL FEES	\$0.00
TOTAL DISBURSEMENTS	\$357.23
TOTAL CHARGES FOR THIS BILL	<hr/> \$357.23
NET BALANCE FORWARD	\$327.30
TOTAL BALANCE NOW DUE	<div>\$684.53</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP  
Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax No. 45-4183914  
March 1, 2021

Invoice No. 135035  
Reference No. 7066-09 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Case Administration

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
128957	11/06/2020	09	JMR	\$3,102.64	\$293.70
130183	12/03/2020	09	JMR	\$168.00	\$33.60
Total Outstanding Balance					\$327.30
Total Amount Due on this Invoice					\$357.23
Total Balance Now Due					\$684.53

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$0.00	\$0.00	\$33.60	\$293.70	\$0.00	\$327.30

Please remit payment within 30 days. Thank you!

**Wick Phillips Gould & Martin, LLP**

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(214) 692-6255  
Federal Tax ID: 45-4183914

March 1, 2021

Invoice No: 135035  
Our File No: 7066-09 JMR  
Billing through: 02/28/2021

Greg Milligan  
Attn: Gregory S. Milligan

**Case Administration**

Balance forward as of invoice dated 12/03/2020	\$1,302.20
Payments received since last invoice	\$974.90
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$327.30</u>
Trust balance carried forward	\$0.00

**DISBURSEMENTS**

01/01/2021	Inventus - Blowbacks, tabs and Binders	325.60
01/15/2021	Inventus - Blowbacks, tabs & binding	31.63
	Total disbursements for this matter	<u>\$357.23</u>

**BILLING SUMMARY**

TOTAL FEES	\$0.00
TOTAL DISBURSEMENTS	\$357.23
TOTAL CHARGES FOR THIS BILL	\$357.23
NET BALANCE FORWARD	\$327.30
TOTAL BALANCE NOW DUE	<div style="border: 1px solid black; padding: 2px;">\$684.53</div>

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(214) 692-6255 facsimile  
Federal Tax No: 45-4183914

March 1, 2021

Invoice No: 135036  
Our File No: 7066-10 JMR  
Billing through: 02/28/2021

Greg Milligan  
Attn: Gregory S. Milligan

### Matter Summary

RE: Claims Administration and Objections

TOTAL FEES	\$985.50
TOTAL DISBURSEMENTS	\$0.00
TOTAL CHARGES FOR THIS BILL	<hr/> \$985.50
NET BALANCE FORWARD	\$14,765.10
TOTAL BALANCE NOW DUE	<div>\$15,750.60</div>

Wiring Instructions:  
Vista Bank  
Routing No.: 111314575  
Account No.: 7027538  
Account Name: WICK, PHILLIPS, GOULD & MARTIN LLP  
Please include invoice number on payment. Thank you!

## Wick Phillips Gould & Martin, LLP

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Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax No. 45-4183914  
March 1, 2021

Invoice No. 135036  
Reference No. 7066-10 JMR

Greg Milligan  
Attn: Gregory S. Milligan

### Claims Administration and Objections

#### Account Statement

Invoice Number	Invoice Date	Matter Number	Billing Attorney	Invoice Amount	Balance Due
128953	11/06/2020	10	JMR	\$168.00	\$33.60
130175	12/03/2020	10	JMR	\$29,627.50	\$5,925.50
131690	01/08/2021	10	JMR	\$29,450.44	\$5,860.60
132674	02/03/2021	10	JMR	\$14,949.65	\$2,945.40
Total Outstanding Balance					\$14,765.10
Total Amount Due on this Invoice					\$985.50
Total Balance Now Due					\$15,750.60

#### Aging of Past Due Amounts

0-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Past Due
\$2,945.40	\$5,860.60	\$5,925.50	\$33.60	\$0.00	\$14,765.10

Please remit payment within 30 days. Thank you!

Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue  
Suite 500  
Dallas, TX 75204  
(214) 692-6200  
(214) 692-6255  
Federal Tax ID: 45-4183914

March 1, 2021

Invoice No: 135036  
Our File No: 7066-10 JMR  
Billing through: 02/28/2021

Greg Milligan  
Attn: Gregory S. Milligan

Claims Administration and Objections

Balance forward as of invoice dated 02/03/2021	\$26,769.35
Payments received since last invoice	\$12,004.25
Adjustments since last invoice	\$0.00
Net Balance Forward	<u>\$14,765.10</u>
Trust balance carried forward	\$0.00

FOR PROFESSIONAL SERVICES RENDERED

02/01/2021	JMR	Correspondence with T. Scannell regarding satisfaction of tax claims and disbursements of escrow account (.2); Analysis and revisions to claim release form drafted by K. Mercer (.7); correspondence on approval of same with G. Milligan, K. Mercer and S. Lawrence (.2)	1.10 hrs	615 /hr	676.50
02/01/2021	NBN	Coordinate production of documents to White Parties.	0.60 hrs	515 /hr	309.00
Total fees for this matter			<u>1.70 hrs</u>		<u>985.50</u>

Greg Milligan as proposed ch 11 trustee of 3443 Zen Garden LP for Professional Services Rendered	Page 1 Invoice No: 135036 Invoice through: 02/28/2021
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**BILLING SUMMARY**

TOTAL FEES	\$985.50
TOTAL DISBURSEMENTS	\$0.00
 TOTAL CHARGES FOR THIS BILL	 \$985.50
NET BALANCE FORWARD	\$14,765.10
TOTAL BALANCE NOW DUE	\$15,750.60

Timekeeper Summary

Name		Hours	Rate	Amount
Partner	JMR Jason M Rudd	1.10	615.00	\$676.50
Partner	NBN Nick B. Nelson	0.60	515.00	\$309.00
		1.70		\$985.50

Required Notice to Clients.

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# **EXHIBIT D**

**Summary of Timekeepers**

<b>Timekeeper</b>	<b>Title</b>	<b>Year Admitted</b>	<b>Billing Rate (2020)</b>	<b>Hours (2020)</b>	<b>Billing Rate (2021)</b>	<b>Hours (2021)</b>	<b>Value</b>
Rudd, Jason M.	Partner	2000	\$ 560.00	369.1	\$615.00	133.10	\$431,744.50
Nelson, Nick B.	Partner	2010	\$ 495.00	102.8	\$515.00	11.40	\$83,586.00
Bailey, Michael W.	Partner	2008	\$ 545.00	19.4	\$575.00	0.50	\$10,588.00
Dalton, Jeff M.	Partner	1999	\$ 515.00	21.3		0.00	\$13,596.00
Keeble, Charles C.	Partner	1986	\$ 560.00	18.1		0.00	\$10,136.00
Zucker, Matthew I.	Partner	2007	\$ 515.00	0.2		0.00	\$103.00
Cannon, Patrick C.	Of Counsel	2002	\$ 425.00	3.9		0.00	\$1,657.50
Lawrence, Scott D.	Associate	2013	\$ 420.00	423.0	\$450.00	98.20	\$321,894.00
Heringer, Daniella G.	Associate	2019	\$ 335.00	59.4		0.00	\$19,564.00
Drawhorn, Lauren K.	Associate	2010	\$ 475.00	8.6		0.00	\$4,085.00
Goins, Ryan A.	Associate	2009	\$ 475.00	3.0		0.00	\$2,280.00
Ramirez, Brenda	Legal Assistant	N/A	\$ 165.00	53.4	\$175.00	17.60	\$18,309.50
						<b>Total:</b>	<b>\$917,543.50</b>

# **EXHIBIT E**

**Summary of Expenses**

<b>Expenses</b>	<b>Amount</b>
Copies	\$ 6,474.25
Exhibit Binders	\$ 2,041.29
Delivery Services	\$ 506.74
Online Research	\$ 424.58
Postage	\$ 1,617.99
Travel & Related Expenses	\$ 283.93
Court Reporting - Auction	\$ 870.55
Transcript	\$ 501.40
Process Serving	\$ 199.50
Discovery Hosting	\$ 3,063.52
Total	\$ 15,983.75



# **EXHIBIT F**



Law with Purpose.®



## Jason M. Rudd

### **PARTNER**

Dallas

jason.rudd@wickphillips.com

T: 214.740.4038

F: 214.692.6255

Jason M. Rudd leads Wick Phillips' restructuring, creditors' rights, and bankruptcy practice, advising clients in all stages of the Chapter 11 and Chapter 7 process, including related litigation and corporate transactions.

Jason represents debtors, secured and unsecured creditors, and creditor committees in Chapter 11 cases. In Chapter 7 proceedings and post-confirmation matters, he represents trustees and litigation trusts in recovering and administering estate assets, including the prosecution of preference, fraudulent transfer, breach of fiduciary duty, alter ego, and other insolvency-related litigation. In all matters, Jason works closely with clients and their advisors and accountants to quickly provide cost-effective options to address the often complex issues faced in insolvency situations.

In addition, Jason advises distressed companies and their officers, directors, and other fiduciaries in pre-bankruptcy planning and in pursuing various bankruptcy alternatives. These representations include coordinating out-of-court workouts, wind downs and debt restructurings, assignments for the benefit of creditors, and receiverships. He also counsels parties in the sale or purchase of assets in financial distress situations.

### **Awards & Honors**

- Best Lawyers in America© (2021)
- Best Lawyers in Dallas, *D Magazine* (2020)
- Texas Super Lawyers Rising Star, *Texas Monthly and Law & Politics Magazine* (2006, 2008-2011, 2015)
- Houston's Best Lawyers, *H Texas Magazine* (2010)

### **Representative Matters**

#### *Debtor Representations*

- Debtors' counsel for the largest commercial crane retailers in the southeastern United States, with over \$100 million in senior secured debt in their Chapter 11 bankruptcy cases. Important issues included prepetition planning, debtor in possession financing, cash collateral, 363 asset sales and plan formulation and confirmation.

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Dallas | 3131 McKinney Avenue | Suite 500 | Dallas, Texas 75204 | 214.692.6200  
Fort Worth | 100 Throckmorton Street | Suite 1500 | Fort Worth, Texas 76102 | 817.332.7788

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- Debtors' counsel for a nation-wide network of commercial roofing companies from pre-bankruptcy planning through plan confirmation. He handled issues related to construction project bonding and surety issues, enforcing the automatic stay, secured creditor negotiations and 363 asset sales.
- Debtor's counsel for residential mortgage banker and broker with 60 branch offices in 35 states in the wind-down of its operations through a liquidating Chapter 11 plan. This representation included the closing of branch offices and handling claims related to mortgage loan wholesale and correspondent agreements.
- Debtor's counsel for international real estate holding company in the sale of over \$30 million in undeveloped real estate through a Chapter 11 plan of reorganization.

#### *Creditor Representations*

- Lead counsel to secured creditors in numerous Chapter 11 proceedings. Specific matters include cash collateral order negotiations, DIP financing issues, opposing plan exclusivity, formulating competing plans of reorganization, litigating lien priority disputes and negotiating plan of reorganization treatment.
- Lead counsel for unsecured creditor clients on a variety of bankruptcy issues, including obtaining critical vendor treatment for prepetition claims, asserting reclamation rights, prosecuting administrative expense claims and conducting post-petition business with Chapter 11 debtors.
- Lead counsel to mortgage lenders and servicers in lien avoidance, TILA and RESPA litigation and as secured creditors in various bankruptcy cases.
- Counsel to various other stake holders in Chapter 11 and Chapter 7 proceedings. Jason has represented equity holders and former officers and directors and in obtaining the appointment of an examiner, seeking the appointment of a Chapter 11 trustee, contesting plan confirmation, investigating claims against the debtors' financial advisors and secured creditors and in obtaining the conversions of a debtor's Chapter 11 case to one under Chapter 7.

#### *Committee Representations*

- Counsel for the Official Committee of Unsecured Creditors of PJJ Management Corporation and its affiliates. Jason served as general bankruptcy counsel for the unsecured creditors committee in the Chapter 11 cases of these specialty engineering and manufacturing debtors. Issues included contesting cash collateral and plan confirmation, investigating claims against the debtors' officer and directors and certain secured creditors and negotiating and obtaining improved treatment for unsecured creditors in the debtors' Chapter 11 plan of reorganization.
- Counsel for the Official Committee of Unsecured Creditors of Logix Communications Corporation. Jason represented the unsecured creditors committee in the Chapter 11 bankruptcy of this telecommunications competitive local exchange carrier in Texas, Louisiana, Oklahoma and Florida. Case issues included investigating lien avoidance and debt recharacterization claims, making a Louisiana World demand to allow the unsecured creditors



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committee to bring claims on behalf of the debtor's estate, negotiating the recovery for and protecting the interests of unsecured creditors.

*Trustee and Receiver Representations*

- Lead bankruptcy counsel for the trustee of Howrey LLP, one of the largest law firm bankruptcies in U.S. history, handling the wind down of operations and offices throughout the U.S. and Europe, collecting millions of dollars in accounts receivable, administering the disposition of hundreds of thousands of cartons of former client files and coordinating secondary liquidation proceedings in foreign jurisdictions.
- Special litigation counsel for the Chapter 7 trustee in prosecuting fraudulent transfer, breach of fiduciary duty, alter ego and single business enterprise claims against over thirty domestic and foreign defendants. The litigation sought to unwind a complex series of transactions involving the transfer of millions of dollars in real estate, securities and partnership interests to entities in the U.S., Australia and China.
- General counsel for the Warranty Gold Liquidation Trust (a trust created by the plan of reorganization confirmed in the In re Warranty Gold, Ltd. Chapter 11 case) to prosecute claims and collect assets for the benefit of over 60,000 consumers holding extended car warranties issued by the now defunct debtor.
- Counsel for temporary and permanent receivers appointed in SEC and FTC receivership actions, handling the administration and sale of assets, establishment and administration of investor and creditor claims procedures and other receivership estate matters.

**All Practice Areas**

- Banking and Finance
- Bankruptcy
- Bankruptcy and Creditors' Rights
- Corporate and Finance
- Real Estate Litigation

**Education**

- Baylor University School of Law (J.D., 2000)
- Kentucky Wesleyan College (B.A., magna cum laude, 1997)

**Admissions**

- Texas
- United States District Court for the Northern, Eastern, Southern and Western Districts of Texas



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## Scott Lawrence

### ASSOCIATE

Dallas

scott.lawrence@wickphillips.com

T: 214.420.4449

F: 214.692.6255

Scott Lawrence represents clients in complex bankruptcy and restructuring matters, seeking to find the most efficient solutions tailored to his clients' unique circumstances. Scott represents both businesses in financially difficult circumstances and clients that are dealing with them, including creditors, lessors, lenders, equity holders, and purchasers of financially distressed companies. Scott has industry expertise from previous representations of restaurants, retailers, oil and gas production and midstream companies, healthcare services providers, landlords, and financial services institutions, among others.

Scott has also represented debtors, trustees, asset acquirers and creditors in liquidations under chapters 7 and 11 and state law wind-downs and receiverships, including cases resulting from fraud or mismanagement. Scott's expertise includes representing clients in all types of bankruptcy litigation, including claims litigation, preference lawsuits, fraudulent transfer claims, and fiduciary litigation.

Prior to joining the firm, Scott practiced at Akerman LLP, where he built a broad base of experience in chapter 11 debtor and creditor representations. He also previously served as a law clerk to two United States Bankruptcy court judges.

### All Practice Areas

- Bankruptcy and Creditors' Rights
- Bankruptcy Litigation
- Corporate and Finance
- Oil & Gas

### Awards & Honors

- Best Lawyers: Ones to Watch (2021)

### Education

- Southern Methodist University Dedman School of Law (J.D., 2013)
- University of Oklahoma (B.A., 2008)

### Admissions

- Texas

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Dallas | 3131 McKinney Avenue | Suite 500 | Dallas, Texas 75204 | 214.692.6200  
Fort Worth | 100 Throckmorton Street | Suite 1500 | Fort Worth, Texas 76102 | 817.332.7788

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- U.S. District Court for the Northern, Southern, Eastern, and Western Districts of Texas
- U.S. Court of Appeals, Second Circuit

U.S. Bankruptcy Court  
903 San Jacinto, Suite 322  
Austin, TX 78701-2450

3443 Zen Garden, LP  
3443 Ed Bluestein Blvd.  
Austin, TX 78721-2912

United States Trustee (SMG111)  
903 San Jacinto Blvd, Suite 230  
Austin, TX 78701-2450

3443 Zen Garden GP, LLC  
c/o Rob Roy Parnell, Receiver  
241 McKellar Road  
Dripping Springs, TX 78620

ABC Supply Co Inc.  
P.O. Box 840899  
Dallas, TX 75284-8099

Adam Zarafshani  
3443 Ed Bluestein Blvd., Building V  
Austin, TX 78721-2912

ABC Supply Co., Inc.  
c/o Andrew Myers, PC  
Attn: Lisa M. Norman  
1885 Saint James Place, 15<sup>th</sup> Floor  
Houston, TX 77056-4176  
SERVED VIA ECF

ACM Services, LLC  
c/o Kell C. Mercer, PC  
1602 E. Cesar Chavez Street  
Austin, TX 78702-4456  
SERVED VIA ECF

ACM Services, LLC  
c/o Nick Morris  
3280 FM 112  
Taylor, TX 76574-4520  
SERVED VIA ECF

Aero Photo  
4000 16th Street North  
St. Petersburg, FL 33703

Ahern Rentals  
P.O. Box 271390  
Las Vegas, NV 89127-1390

Allied Sales Company  
P.O. Box 6116  
Austin, TX 78762-6116

Austin Commercial & Residential Plumbing  
2407 S. Congress Ave, Ste132  
Austin, TX 78704-5505

Austin Glass & Mirror  
6308 Decker Lane  
Austin, TX 78724-5102  
SERVED VIA ECF

Austin Glass & Mirror, Inc.  
c/o Kell C. Mercer, PC  
1602 E. Cesar Chavez Street  
Austin, TX 78702-4456  
SERVED VIA ECF

BPI  
P.O. Box 405300  
Atlanta, GA 30384-5300

Blue Fish Collaborative, Inc.  
P.O. Box 40792  
Austin, TX 78704-0014

Capital Industries, LLC  
c/o Kell C. Mercer, PC  
1602 E. Cesar Chavez Street  
Austin, TX 78702-4456  
SERVED VIA ECF

Capital Pumping, LP  
3200 Steck Ave, Suite 220  
Austin, TX 78757-8032  
SERVED VIA ECF

Capital Pumping, LP  
c/o Stephanie O'Rourke  
Cokinos Young  
10999 IH 10 West, Suite 800  
San Antonio, Texas 78230-1349  
SERVED VIA ECF

Christopher G Burwell  
230 Pereida Street  
San Antonio, TX 78210-1145  
SERVED VIA ECF

Capital Industries, LLC  
2105 Donley Dr., Ste. 200  
Austin, TX 78758-4510

CT Laborers Electric, LLC  
188 Alaska Road  
Uhland, TX 78640-6644

City of Austin  
c/o Anne Morgan  
301 W. 2nd Street  
Austin, TX 78701-4652

DM's Construction Equipment Repair  
518 Yucca Drive  
Round Rock, TX 78681-7411

Eightfold Development, LLC  
3443 Ed Bluestein Blvd., Building V  
Austin, TX 78721-2912

Equipment Share  
5710 Bull Run Dr  
Columbia, MO 65201-2860

Dan White  
c/o Jeffrey M Tillotson  
Tillotson Law  
1807 Ross Avenue, Suite 325  
Dallas, TX 75201-8040  
SERVED VIA ECF

Dan White, Individually  
Dan White Family Trust  
c/o Deborah D. Williamson, Dykema Gossett  
112 E. Pecan St #1800  
San Antonio, TX 78205-1521  
SERVED VIA ECF

Equipmentsshare.com, Inc.  
c/o Richard J. Wallace, III  
Schief & Stone LLP  
500 N. Akard, Suite 2700  
Dallas, TX 75201-3306  
SERVED VIA ECF

Ferguson Enterprises Inc.  
2551 North Mays  
Round Rock, TX 78665-2411  
SERVED VIA ECF

Ferguson Waterworks, LLC  
#1106 4427 Factory Hill Drive  
San Antonio, TX 78219-2704

GSC Architects  
3100 Alvin Devanne Bldg. A  
Ste. 200-B  
Austin, TX 78741-7406

Fritz, Byrne, Head & Gilstrap, PLLC  
Attn: Lisa C. Fancher  
221 West Sixth Street, Suite 960  
Austin, TX 78701-3444  
SERVED VIA ECF

H&H Crane Services, Inc. dba Texas Crane Svc  
c/o Sam Drugan  
Warren, Drugan & Barrows, P.C.  
800 Broadway, Suite 200  
San Antonio, TX 78215-1241  
SERVED VIA ECF

Hinshaw & Culbertson LLP  
151 North Franklin St., Ste. 2500  
Chicago, IL 60606-1915

Hill Country Electric Supply, LP  
c/o Kell C. Mercer, PC  
1602 E. Cesar Chavez Street  
Austin, TX 78702-4456  
SERVED VIA ECF

Jeremie Schultz  
6555 Hwy 140 W  
Puryear, TN 38251-3943

Lone Star Materials  
11111 Bluff Bend  
Austin, TX 78753-3221  
SERVED VIA ECF

MOHD Service Solutions LLC  
3701 E. Plano Parkway Ste 400  
Plano, TX 75074-1806

Ferguson Enterprises, LLC  
c/o Anthony F. Ciccone  
611 West 14<sup>th</sup> Street  
Austin, TX 78701-1725  
SERVED VIA ECF

Fritz, Byrne, Head & Gilstrap  
221 West Sixth Street, Ste 960  
Austin, TX 78701-3444

Great Lakes Lifting Solutions  
4910 Wilshire Blvd.  
Country Club Hills, IL 60478-3153

Glass.com of Illinois  
910 Riverside Dr., Unit 4  
Elmhurst, IL 60126-4979  
SERVED VIA ECF

Hays County  
c/o Tara LeDay  
P.O. Box 1269  
Round Rock, TX 78680-1269  
SERVED VIA ECF

Hollandstone  
P.O. Box 50058  
Austin, TX 78763-0058

Koetter Fire Protection of Austin, LLC  
16069 Central Commerce Drive  
Pflugerville, TX 78660-2005  
SERVED VIA ECF

Keytech North America  
20 PGA Drive Suite 201  
Stafford, VA 22554-8218

Lone Star Materials, Inc.  
c/o Dennis A. McQueen  
Pagel, Davis & Hill, P.C.  
1415 Louisiana, 22<sup>nd</sup> Floor  
Houston, TX 77002-7344  
SERVED VIA ECF

Mark Schiffgens, CPA  
100 E. Anderson Lane Ste 250  
Austin, TX 78752-1233

Ferguson Enterprises, LLC  
c/o Misti L. Beanland  
8131 LBJ Freeway, Suite 700  
Dallas, TX 75251  
SERVED VIA ECF

Frontier Plastering  
P.O. Box 1455  
Elgin, TX 78621-1455

Hilti Inc.  
P.O. Box 650756  
Dallas, TX 75265-0756

H&H Crane Services, Inc. dba Texas Crane Svc  
c/o Robert L. Barrows  
Warren, Drugan & Barrows, P.C.  
800 Broadway, Suite 200  
San Antonio, TX 78215-1241  
SERVED VIA ECF

Hill Country Electric Supply  
P.O. Box 577  
San Antonio, TX 78292-0577  
SERVED VIA ECF

Hull Supply, Inc.  
5117 East Cesar Chavez  
Austin, TX 78702-5142

Koetter Fire Protection of Austin, LLC  
c/o Kell C. Mercer, PC  
1602 E. Cesar Chavez Street  
Austin, TX 78702-4456  
SERVED VIA ECF

MLA Geotechnical  
2800 Longhorn Blvd Suite 104  
Austin, TX 78758-7624

Lyle America, Inc.  
d/b/a Glass.com of Illinois  
1602 E. Cesar Chavez Street  
Austin, TX 78702-4456  
SERVED VIA ECF

McMinn Land Surveying Company  
4008 Greenmountain Lane  
Austin, TX 78759-7570



Mint Engineering, LLC  
5130 Mansfield View Court  
Austin, TX 78732-1854

Mobile Mini Storage Solutions  
4646 East Van Buren Street Suite 400  
Phoenix, AZ 85008-6927

NLB Corp.  
29830 Beck Road  
Wixom, MI 48393-2824

Nathan Olson  
11308 Wet Season Dr.  
Austin, TX 78754-5855

Texas Concrete  
Oldcastle Materials, Inc  
1320 Arrow Point Dr. Ste 600  
Cedar Park, TX 78613-2189

Paradigm Glass  
9603 Saunders Lane, #B-2  
Austin, TX 78758-5230

Panache Development & Construction  
P.O. Box 26539  
Austin, TX 78755-0539  
SERVED VIA ECF

Panache Development & Construction, Inc.  
1100 Norwood Tower  
114 W. 7<sup>th</sup> Street  
Austin, TX 78701-3000  
SERVED VIA ECF

Praxair Distribution, Inc.  
Dept 0812 P.O. Box 120812  
Dallas, TX 75312-0812

Professional StruCivil Engineering  
12710 Research Blvd., Suite 390  
Austin, TX 78759-4380  
SERVED VIA ECF

Professional Flooring  
P.O. Box 7558  
Fort Worth, TX 76111-0558

Ram Tool & Supply Co, Inc  
Attn: Legal  
4500 5th Ave S, Bldg A  
Birmingham, AL 35222

Regal Plastics Supply Company, Inc  
9200 N. Royal Ln. Suite 120  
Irving, TX 75063-2468

Reinhart & Associates, Inc.  
P.O. Box 140105  
Austin, TX 78714-0105

Rob Roy Parnell  
c/o G. Stewart Whitehead  
Winstead, PC  
401 Congress Avenue Ste 2100  
Austin, TX 78701-3798

Rob Roy Parnell, Receiver  
251 McKellar Road  
Dripping Springs, TX 78620-4884

Roca  
11190 NW 25th Street  
Miami, FL 33172

Ruiz Testing Services, Inc  
10854 Gulfdale St.  
San Antonio, TX 78216-3607

Rompsen Mortgage Limited Partnership  
c/o Mark T. Michell  
Foley & Lardner LLP  
600 Congress Ave., Suite 3000  
Austin, TX 78701-3056  
SERVED VIA ECF

Rompsen Mortgage Limited Partnership  
162 Cumberland Street, Suite 300  
Toronto, Ontario M5R  
SERVED VIA ECF

Rompsen Mortgage Limited Partnership  
Foley & Lardner LLP  
Attn: Tom Scannell  
2021 McKinney Avenue, Suite 1600  
Dallas, TX 75201-3340  
SERVED VIA ECF

Schindler Elevator Corp.  
2020 Centimeter Center  
Austin, TX 78758-4956  
SERVED VIA ECF

Schindler Elevator Corporation  
c/o Barbara Emerson  
Bellinger & Suberg, LLP  
12221 Merit Drive, Suite 1750  
Dallas, TX 75251-2281  
SERVED VIA ECF

Summer Legacy, LLC  
c/o Kell C. Mercer, PC  
1602 E. Cesar Chavez Street  
Austin, TX 78702-4456  
SERVED VIA ECF

Sigmax Corporation  
321 N. Oakhurst Dr.#602  
Beverly Hills, CA 90210-4175

Structures  
6926 N. Lamar Blvd  
Austin, TX 78752-3508

Summer Legacy, LLC  
P.O. Box 144151  
Austin, TX 78714-4151  
SERVED VIA ECF

Sweep Across Texas  
1512 Dungan Lane  
Austin, TX 78754-4022

The Bug Master  
1912 Smith Rd.  
Austin, TX 78721-3547

Trane  
P.O. Box 845053  
Dallas, TX 75284-5053

Texas Air Industries  
401 Congress Ave., Suite 111540  
Austin, TX 78701-4071  
SERVED VIA ECF

Texas Air, LLC  
c/o Christopher Stanley  
Sneed, Vine & Perry  
108 E. 8<sup>th</sup> Street  
Georgetown, TX 78626-5802  
SERVED VIA ECF

Texas Crane Service  
203 S. W.W. White Rd.  
San Antonio, TX 78219-4221  
SERVED VIA ECF

Travis County  
c/o Jason A. Starks  
P.O. Box 1748  
Austin, TX 78767-1748  
SERVED VIA ECF

Travis County, Texas  
P.O. Box 1748  
Austin, TX 78767-1748  
SERVED VIA ECF

Wembley Metal Buildings  
11914 Radium Street  
San Antonio, TX 78216-2713  
SERVED VIA ECF

Wembley Metal Buildings, LLC  
c/o Christopher Burwell  
230 Pereida Street  
San Antonio, TX 78210-1145  
SERVED VIA ECF

B. Russell Horton  
George Brothers Kincaid & Horton LLP  
114 West 7<sup>th</sup> St. Ste. 1100  
Austin, TX 78701-3015  
SERVED VIA ECF

G. Stewart Whitehead  
Winstead, PC  
401 Congress Avenue, Suite 2100  
Austin, TX 78701-3798  
SERVED VIA ECF

Gregory S. Milligan  
Chapter 7/11 Trustee  
Harney Management Partners, LLC  
P.O. Box 90099  
Austin, TX 78709-0099  
SERVED VIA ECF

United States Trustee – AU12  
903 San Jacinto Blvd, Suite 230  
Austin, TX 78701-2450

Dealers Electrical Supply Company  
P.O. Box 14624  
Austin, TX 78761

Foran, O'Toole & Burke, LLC  
321 North Clark Street, Suite 2450  
Chicago, IL 60654

Niilo Studios, LLC  
1726 Giles Street  
Austin, TX 78722

Howard L. Adelman  
Adelman & Gettleman, Ltd.  
53 W. Jackson Blvd., Suite 1050  
Chicago, IL 60604

Mount Hawley Insurance Company  
9025 North Lindbergh Road  
Peoria, IL 61615

Star Insurance Company  
26255 American Drive  
Southfield, MI 48034

Doucet & Associates  
7401B Highway TX-71 West  
Austin, TX 78735

Sprouse Shrader Smith PLLC  
Attn: Terry Irion  
805 Las Cimas Parkway  
Las Cimas III, Suite 350  
Austin, TX 78746